

RESPONSES TO COMMENTS ON THE DRAFT SEIS

SECTION 1: INTRODUCTION

This appendix is a summary of all comments received on the Supplemental Draft Environmental Impact Statement for the winter use plans of Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway (SEIS). It also contains responses to comments as necessary under CEQ regulations. Section 2, below, contains an overview of the process and a breakdown of comment types, numbers, and content. Section 3 contains the summarized content of all form letters received, with responses, and Section 4 contains non-form letter comments and responses. The content of form letters and non-form letters is overall very similar. Non-form letters are in many cases distinguished by the personal remarks, expressions of concern, or other comments that are demonstrably individual in nature. Section 5 contains summaries of letters that are representative of the body of comment as a whole, and responses to them.

In preparing an FEIS, an agency is required to assess and consider comments both individually and collectively. The agency is required to respond by one or more of the following means, while stating its response in the final statement (40 CFR 1503.4). Possible responses:

- Modify alternatives.
- Develop and evaluate alternatives not given serious consideration.
- Supplement, improve, or modify analyses.
- Make factual corrections.
- Explain why comments do not warrant further agency response.

All substantive comments received on a DEIS (or summaries thereof where the response has been exceptionally voluminous), should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement (40 CFR 1503.4[5][b]). A substantive comment is one that is specific in addressing the adequacy of the statement or the merits of the alternatives discussed, or both (40 CFR 1503.3 Specificity of comment). Substantive comments relate to material or issues that have been deemed deserving of study when defining the scope of the analysis (40 CFR 1500.4 Reducing paperwork).

Public comments on the Winter Use DSEIS were exceptionally voluminous, consisting of a variety of form letters, letters not subscribing to a form, and other letters that examine the DSEIS in some detail. Substantive comments may be found among all types of letters. However, letters examining the DSEIS in detail may contain a higher percentage of comments that regarded as substantive. Therefore, the entire body of comment is summarized in this appendix and all comments are responded to. For the most part, responses consist of explanations. Where a response also consists of some action reflected in the FSEIS analysis, it is noted.

The reader should note that many comments shown in this summary are not substantive, but they are included in an attempt to portray what the public has stated. The summarized letters in the Section 5, in particular, contain statements that help provide a context for any substantive remarks in the letter. The full text of each of these letters is reproduced in Appendix A of this FSEIS. It is appropriate to refer to the summarized letters as “representative.” The summarized letters, as a group, are representative of the content and substance of the entire body of comment. Most of the form letters were apparently generated from the representative letters.

SECTION 2: OVERVIEW OF THE COMMENT PROCESS AND CONTENT

On March 29, 2002, the National Park Service released the SEIS to supplement the Final Environmental Impact Statement (FEIS) for the winter use plans issued in October 2000. The decision resulting from the FEIS would phase out snowmobiles in the three parks over three years, and provide for over-snow access by snowcoach beginning the winter of 2003-04. The National Park Service undertook the supplemental NEPA process to provide for additional public comment and consider new information from snowmobile manufacturers on their new generation of “cleaner and quieter” snowmobiles.

About 307,592 individuals, organizations, and businesses chose to participate in the supplemental NEPA process by submitting comments.¹ This represents the largest amount of public comment letters received on any project in the National Park Service. The comments included form and non-form letters, both mailed and electronic mail, and petitions.

The comments were sorted to identify potential substantive comments, i.e., those that request the agency to modify alternatives; to develop and evaluate alternatives not previously given serious consideration by the agency; to supplement, improve, or modify its analyses; or to make factual corrections. The NPS does not consider all of the information contained in the comment summaries as substantive. Due to the tremendous volume of comments received, summaries of the comments tentatively identified as substantive were compiled, as allowed by regulation (40 CFR 1503.4). The letters that are summarized and responded to in section 4, below, are best described as representative. The content of this representative group of letters, with respect to substance in particular, encompasses the content of the entire body of comment. In the summaries, the commenters own words were used or paraphrased in terms similar to the language contained in the letters. The representative letters are duplicated in their entirety (Appendix A).

Following the identification of the comments initially identified as substantive, the remaining comments were sorted by general support for an alternative or action. Each comment then was reviewed by at least one member of the NPS planning team. Many of the non-form comments contained personal recollections of prior experiences in the parks. The content of these letters was recorded using a coding system. CEQ regulations require the agency to respond to all comments, as a minimum, by explaining why those comments do not warrant further agency response, citing the sources, authorities, or reasons that support the agency’s position and, if appropriate, indicating those circumstances that would trigger agency reappraisal or further response.

For the most part, comments fell into two categories, those that supported the immediate phase-out of snowmobiles, i.e., the existing decision or alternative 1a, and those that want public snowmobile use to continue in the parks at a high level, i.e., alternative 2. Those who commented primarily are from the United States, although NPS received comments from persons in other nations. The following table identifies the numerical results of the sorting process undertaken by the planning team.

¹ This amount does not account for duplicates, e.g., those letters that were sent both via the Internet and the U.S. Postal System.

	Form Letters [†]	Non-form Letters	Representative Letters
Support snowmobile use	61,897	1,309	52
Support snowmobile ban	235,167	9,107	56
Neutral [‡]			7

[†] This amount does not account for duplicates, e.g., those letters that were sent both via the Internet and the U.S. Postal System.

[‡] Petitions containing multiple signatures were considered as a separate comment for each signature and included in the form letters category.

SECTION 3: FORM LETTER CONTENT AND RESPONSE

The majority of the comments received on the DSEIS were form letters. Nearly all form letters are traceable to common roots in the letters received from Cooperating Agencies or advocacy groups either favoring snowmobile use or supporting the existing decision. These letters are summarized in the last section of this document. A form letter is defined as a letter whose content is essentially duplicated by several commenters. The body of form letter content fell into one of two general categories: those who support the continued use of recreational snowmobiles in the parks (Table A), and those who support the existing decision to phase them out in favor of snowcoach access Table B). Accordingly, this section consists of two tables. Each table lists statements made within the range of form letters having that general orientation. Next to the statement is a count of the number of times the statement is made, arrayed from high to low. This presentation shows perhaps the most strongly held opinions or concerns in the body of comment. Some letters placed in the form letter categories contained personal anecdotal information which, though interesting, is not regarded as pertinent to the content of the EIS.

Forty-four form letter types were identified from those who favor continued access into the three park units. A total of 72,036 form letters were received in this general category. The planning record contains an accounting of the numbers received for each form letter type.

Table A: Comments of those Favoring Continued Snowmobile Access/Responses

COMMENTS EXPRESSING SUPPORT FOR AN ALTERNATIVE OR AN ALTERNATIVE ACTION
<p>GENERAL RESPONSE: TO THE FOLLOWING COMMENTS:</p> <p>In general the tenor of theses expressions of support and opposition appear to relate to the decision that the commenter would like to see the NPS make. The comments will be considered in making the final decision but there is nothing in those opinions that would substantially alter the range of alternative features to be considered in the FSEIS. For example if the features that are not supported were to be deleted from the range of alternatives then the analysis would be left only with features that the commenter agrees with. If only the actions that are supported by the commenter remain then there is effectively only one alternative. Accordingly, the commenter concludes that there is only one alternative that warrants consideration. From the NEPA standpoint the analysis cannot be limited in this fashion. Therefore, expressions of support or objection will not be responded to; in general, by changes in the alternative features discussed in the SEIS, they are listed here for the readers' information.</p>

The purpose for preparing this SEIS, as agreed to in the settlement agreement and as published in the Federal Register Notice of Intent includes the soliciting of more public comment on the earlier decision. Because of the desire on the part of the decision makers to receive additional information from the public these types of comments, while not particularly applicable to the NEPA process, are very important. These comments convey political sentiments and personal support for an alternative and the various provisions therein.
Keep snowmobiles in the parks or I object to the banning of snowmobiles
I support alternative 2 (with minor change)
I support alternative 2 developed by the Cooperating Agencies
I support the general concepts in alternative 2.
I support alternative 2 and oppose all the other alternatives
I support strict enforcement of speed limits and existing laws and regulations.
I support the use of a 35 mph speed limit between West Yellowstone and Old Faithful.
I support cleaner/quieter snowmobiles, but EPA should decide what level of emissions is allowed in the parks, not the NPS.
I support pilot program features including advance sale of permits and increased numbers of rangers.
I support alternative 3.
I support adaptive management so parks can be responsive to new technology.
I support interim daily entry limits for snowmobiling, based upon historic daily averages, mid-Dec until mid-March, until a long-term capacity study is completed.
I support interim daily entry limits for snowmobiling, based upon historic daily averages.
I support reasonable daily entry limits
Keep snowplanes on Jackson Lake.
Historic annual use levels should be maintained.
I believe 75 dB is a reasonable level at which to regulate snowmobile sound, since it is half as loud as the current regulation.
I believe 75 dB is a reasonable level at which to regulate snowmobile sound
I believe in regulating sound at a reasonable level
I support eliminating high use peak days that have led to over- crowding during holidays. Manage these by a reservation system or by a daily cap.
Historic visitor use should be maintained in support of individual use preference.
I support advance sale of park permits, but they should be larger and more visible.
New technology and proper management alone (dispersion and regulations) are sufficient to solve snowmobile-related problems.
I do not support any proposal for snowmobiles to be prohibited entry to the parks.
I do not agree that only 4-stroke snowmobiles should be allowed in the parks.
I do not support any proposal for snowmobile access only with a guide.
I do not support limits or advance permit sales, but support more rangers for security purposes.
I support reasonable restrictions on snowmobiles. Use proper management rather than banning snowmobiles.
I support tighter controls such as reduced numbers or guided only snowmobile trips.

I oppose alternative 3 concepts such as guided use only.
Night time travel should be discouraged or prohibited

STATEMENTS OF OPINION AND GENERAL EXPRESSIONS OF CONCERN

GENERAL RESPONSE TO THE FOLLOWING COMMENTS:

Comments identified, as general expressions of concern are not specific or substantive in nature as defined in the CEQ regulations (§1503.3 and §1503.4). Specifically they are not specific in regard to the analysis or the alternatives and they do not address the adequacy of the draft SEIS, the merits of the alternatives or provide additional relevant information that is within the scope of the purpose and need for action. They can generally be characterized as personal opinions on resources or park management, or other statements that would not be responded to by any change in the draft SEIS. It should be noted that for a great many of the comments that express general concern about resources or other impact topics similar but more specific comments are recorded and responded to in their respective subject areas in other sections of this response document. Due to the large volume of comments, similar statements are grouped as summary comments and actual examples are provided. Where a comment doesn't fit in within a grouping, or it is sufficiently different from other comments, it is stated in the original words of the commenter.

The NPS wishes to emphasize that because a comment or comment category does not warrant a formal response under CEQ regulations it does not reduce its importance to the process. NEPA is a decision making process designed to provide decision makers with a breadth of information on which to base a well reasoned decision. Public opinion, although not directly relevant to most analysis, is a key element to be considered by the decision makers.

The NPS would like to thank the all the commenters who took the time to share their thoughts and concerns in the many letters and emails received during the comment period. The body of comment received was notable not only because of its remarkable size but also in the high level of passion and conviction communicated by the commenters and their great concern for the well being of the three park areas.

SUMMARY COMMENTS:

Snowcoaches are unpleasant/not as enjoyable as snowmobiles I don't want to ride in a snowcoach

I won't tour the park by snowcoach

Snowmobiles do not harm/disturb the environment or wildlife.

Snowmobiles are not noisy.

Most snowmobilers adhere to all regulations

Snowmobilers appreciate the unique park/winter experience (values, family outings, etc.)

Snowmobile and snowcoach use can coexist. One use should not be banned.

Snowplanes cause no environmental damage; provide access for many senior citizens

The ban is too devastating on small communities.

I am very concerned that snowmobiles are severely degrading qualities of parks

Snowmobiles have peacefully coexisted with the environment for decades, and do not harm it.
Snowmobiles do not bother other visitors

New technology takes away most of the perceived pollution or other concerns.

New 4-stroke technology takes away most of the perceived environmental concerns

I won't come to the park if I can't ride my snowmobile

I believe that flawed information/”science” was used in the making the initial ban decision
Please protect (maintain) the snowmobile experience for future generations (kids and grandkids).
Protect my right to access the park via a personal vehicle. I want to see the park at my own pace.
Respect for individual preference for access should be allowed.
Freedom to ride at my own pace is the best way to experience the park.
National parks are for everyone, not just a few (environmentalists, etc.)
SUMMARY COMMENT: Snowmobiles are less polluting than all the cars and buses in the summer.
SUMMARY RESPONSE: Comparisons of this type reveal are of little use from an analytical perspective. First, different snowmobiles emit different levels of different pollutants just as different makes and models of wheeled vehicles do. Secondly, the numbers of wheeled vehicles are far greater in the summer than the number of snowmobiles entering the parks in the winter. Even considering this, Snowmobiles account for 27% of the annual emissions of CO and 77% of annual emission of HC using an equivalent best estimate for summer mobile emission sources. The commenter is referred to the discussion of air quality in Chapter III of the SEIS.
SUMMARY COMMENT: Many people stated that park visitors have a right to access the parks via snowmobiles. Commenters explained that they were concerned about protecting park resources. Some commenters pointed out that the vast majority of snowmobilers observe the rules and regulations. Others noted that the wonders of the park in the winter are especially enjoyable while snowmobiling.
SUMMARY RESPONSE: The commenters are referred to the purpose and need for action, including the discussions of laws, policy and executive orders that apply to winter use, are presented in Chapter I of the SEIS.
SUMMARY COMMENTS: Yellowstone was created as a “public park or pleasuring-ground for the benefit and enjoyment of the people” which is prevented by the ban.
Respect for individual preference for access should be allowed. Freedom to ride at my own pace. Riding a snowmobile is the best way to experience the park.
Eliminating snowmobiles and allowing access only by snowcoach violates the original intent of national parks.
SUMMARY RESPONSE: The commenters are correct that Yellowstone’s enabling legislation (17 State.32), enacted in 1872, states that the park is set aside for the benefit of the people. The NPS points out, however, that section 2 of the legislation goes on to state that the Secretary of the Interior shall have control over the parks and shall “make and publish such rules and regulations as he may deem necessary or proper for the care and management of the same. Such regulations shall provide for the preservation, from injury or spoliation, of all timber, mineral deposits, natural curiosities, or wonders within said park, and their retention in their natural condition.” A

careful reading of the legislation reveals that while the parks were created for the enjoyment of the people- their enjoyment shall not be undertaken at the expense the natural wonders in their natural condition. Further it would be unconscionable to promote an activity that precluded others enjoyment of those same wonders in their natural condition. Under the original decision winter access to the parks would be maintained at (historic use levels) and enjoyment of the natural wonders of the parks -by the public -would continue.

NPS policy provides further guidance to the parks on this issue: “Providing opportunities for appropriate public enjoyment is an important part of the Service’s mission. Other park uses that are unrelated to public enjoyment – may sometimes be allowed as a right or privilege if they are not otherwise prohibited by law or regulation. In exercising its regulatory authority the Service will allow only uses that are 1) appropriate to the purpose for which the park was established and (2) can be sustained without causing unacceptable impacts to park resources and values. Recreational uses that would impair park resources cannot be allowed. The only exception is when an activity is specifically mandated by Congress”(NPS Management Policies 2001)

SUMMARY COMMENT:

Alternative 3 will impel manufacturers to use new technology for cleaner and quieter machines.

SUMMARY RESPONSE:

Use of a “best available technology” approach over time is intended to encourage ongoing improvement in technology. The use of best available technology is analyzed in several alternatives in the SEIS.

ALTERNATIVE FEATURES

GENERAL RESPONSE TO THE FOLLOWING COMMENTS:

Over the course of this planning process, many suggestions for alternative features have been made by commenters. Many of the suggested features have already been incorporated in one or more of the alternatives presented in the DSEIS, the FEIS or the DEIS. This response document incorporates by reference the responses to all suggested alternative features in the previous winter use EIS process. The reader is referred to volume III parts I through III.

Some of the suggestions listed below are slight variations of alternative features included in the DSEIS or the FEIS. It is important to note that numerous suggestions for alternatives and alternative features were made in the thousands of comments received. It is clear that for such complex issues that an infinite number of possible alternative features or combination of features could be developed. CEQ regulations require that in such instances, the agency need only consider a reasonable number or examples that cover the full spectrum of possible alternatives that meet the purpose and need. (Question 1b, CEQ 40 Most Often Asked Questions.) What constitutes a reasonable range depends on the nature of the proposal and the facts in each case where the proposal is at the discretion of agency.

The winter use plan is intended to be a programmatic plan. It is intended to make decisions at a general level and defer many site-specific or implementation types of decisions to a later date (much like an NPS General Management Plan or a USFS Forest Plan). In addition to general decisions, programmatic plans and EISs may contain (as alternative features) processes that would be followed such as adaptive management or advisory committees. In a programmatic document it is also appropriate to examine whether certain management activities are contributing to an issue or problem relevant to the plan. These types of features (for example, lower speed limits) may appear to be solely implementation strategies and not appropriate for inclusion in a programmatic document. The important distinction, from a programmatic perspective, is that in some cases a smaller or more specific feature such as speed limits may affect a programmatic issue such as natural soundscapes or health and safety. The question for the programmatic analysis is not whether 35 or 45 is the safest or quietest speed, but whether oversnow vehicle speed is a significant contributor to vehicle accidents, collisions with wildlife or results in adverse effects on the natural soundscape or visitor experience.

Many people focused their comments on the features of alternatives that they favored and many others focused on those features to which they were opposed. As stated above, while this information is important to relay to decision makers it does not warrant a formal response under CEQ regulations (see § 1503.4).

COMMENT:

Increase groomed nonmotorized trails and numbers/size of warming huts to mitigate “perceived” user conflicts

RESPONSE:

Several alternatives examined in the FEIS included an increase in size and number of warming huts, this action item is also included in alternatives 1a, 1b, 2 and 3 in the SEIS and is available for selection by the decision maker. Because the scope of the SEIS is limited to an examination of the effects of new snowmobile technologies increasing the number of nonmotorized trails was not considered within the scope of this document. The commenter is referred to pages 5-6 of the Record of Decision for a listing of areas to be groomed for nonmotorized use in the parks in future winter seasons.

COMMENT:

Use better technology (scanners or something) to see if air quality is really affected.

RESPONSE:

The commenter is referred to the methodologies and assumptions sections for air quality of the FEIS (pages 206-211) and the SEIS (pages 170-204) for technologies utilized the air quality analysis. The adaptive management provisions of all the alternatives in the DSEIS require that monitoring of air quality continue in the parks.

COMMENT:

Make it mandatory for all snowmobilers to first attend a wildlife respect and safety class. This could be done in the park.

RESPONSE:

Additional education is an integral part of nearly all the alternatives analyzed in the FEIS and SEIS. The commenter is referred specifically to the implementation strategies outlined in alternative 2 of the SEIS.

COMMENT:

Control use by lottery, use limits, daily closures. Screen all users/operators' driving and criminal records – withhold permits as needed.

RESPONSE:

Lotteries, use limits, and daily closures are all legitimate strategies for implementing daily use limits. The commenters are referred to the implementation strategy sections of the alternatives in the SEIS. The screening of criminal records for all persons who enter the parks is neither constitutional nor practicable.

COMMENT:

Disperse snowmobile use on existing routes and add new routes by grooming existing roads.

RESPONSE:

The great majority of roads that currently travel through the parks are groomed for snowmobile use in the winter. The only routes that are currently plowed are those that provide essential wheeled vehicle access to communities such as Cooke City, West Yellowstone and Moran. One way to disperse snowmobile numbers in the parks is to limit the number of vehicles allowed through each gate. The commenter is referred to the interim limit levels suggested in alternatives 2 and 3.

COMMENT:

Sound levels should be established using SAE test protocols.

<p>RESPONSE:</p> <p>Regulations for the NPS must be promulgated through a legally required process that includes publication in the federal register and public comment. It is unclear how the SAE testing protocols would be appropriate for establishing regulation. If it can be assumed that the commenters intended to suggest that SAE test protocols be used to monitor sound levels or to set standards for sound levels, the NPS agrees that the SAE testing protocols may be a useful implementation or monitoring tool. The SAE protocols may be one tool used in <i>setting</i> a sound standard or in monitoring vehicle sound to ensure that vehicles entering the parks comply with the regulation. If the commenter is suggesting that the SAE protocols are the only method to accurately measure sound levels, the NPS respectfully disagrees. In addition to the loudness of vehicles, it is also important to assess audibility. Audibility is assessed in terms of distances to the limits of vehicle audibility, acres of land affected by audible vehicle traffic and the percentages of time that vehicles are audible in sections of parkland. The distance of the limit to audibility depends on both the background (ambient sound level) and the rate at which sound drops off with distance, calculations for different background sound conditions and different terrain types. It is also important to evaluate the average magnitude of sound from vehicles.</p>
<p>COMMENT:</p> <p>Park permits should be larger and more visible.</p>
<p>RESPONSE:</p> <p>Although helpful, this comment is an implementation strategy. If snowmobiles are permitted in the parks it will be shared with those responsible for implementing the winter use program. The commenter is referred to the implementation strategies listed under alternative 2 in the DSEIS.</p>
<p>COMMENT:</p> <p>Cleaner emission requirements should be phased in over a period of years. (2-5)</p>
<p>RESPONSE:</p> <p>See alternatives 2 and 3 in the SEIS and alternatives B and D in the FEIS.</p>
<p>COMMENT:</p> <p>Cooperating partnerships should be developed to expand resources for education, with emphasis on ethics, rules, safety and park appreciation.</p>
<p>RESPONSE:</p> <p>The commenter is referred to alternatives 1a, 1b, 2 and 3 in the DSEIS.</p>
<p>SUMMARY COMMENT:</p> <p>Travel on roads in YNP should be discouraged from 8 PM to 7:30 AM. Travel on roads in YNP should be discouraged from 8 PM to 8 AM. Travel on roads in YNP should be discouraged from 10 PM to 6 AM.</p>
<p>RESPONSE:</p> <p>The NPS appreciates the thoroughness of the many comments received regarding nighttime closures in YNP. The range of closures suggested by the commenters are covered in alternatives B, D, E, G in the FEIS and in alternatives 1a and 1b, 2 and 3 in the SEIS.</p>

ANALYSIS	
COMMENT:	Impacts of snowcoaches are understated and should be reevaluated.
RESPONSE:	Impacts of snowcoaches have not been shown to be understated. However, a complete assessment of pollution and sound emission factors for snowcoaches has been undertaken for the FSEIS, and the impact analysis is changed accordingly.
COMMENT:	NPS is promoting Mattracks vehicles that make deep, unsafe cuts on groomed trails.
RESPONSE:	NPS has decided that Mattracks used over the last several years have been highly successful.

Thirty-six form letter types were identified from those who support the existing decision phasing snowmobiles out of the three park units. A total of 277,739 form letters were received in this general category. The planning record breaks down numbers received for each form letter type.

Table B: Form Letters Supporting the Existing Decision - Comments and Responses

OPINIONS AND GENERAL EXPRESSIONS OF SUPPORT
<p>GENERAL RESPONSE TO THE FOLLOWING COMMENTS:</p> <p>In general, expressions of support and opposition appear to relate to the decision that the commenter would like to see the NPS make. The comments should be considered in making the final decision but there is nothing in those opinions that would substantially alter the range of alternative features to be considered in the FSEIS. For example if the features that are not supported were to be deleted from the range of alternatives then the analysis would be left only with features that the commenter agrees with. If only the actions that are supported by the commenter remain then there is effectively only one alternative. Accordingly, the commenter concludes that there is only one alternative that warrants consideration. From the NEPA standpoint the analysis cannot be limited in this fashion. Therefore, expressions of support or opposition will not be responded to by changes in the alternative features discussed in the SEIS, but they are listed here for the readers' information.</p> <p>The purpose for preparing this SEIS, as agreed to in the settlement agreement and as published in the Federal Register Notice of Intent, includes the soliciting of more public comment on the earlier decision. Because of the desire on the part of the decision makers to receive additional information from the public these types of comments, while not particularly applicable to the NEPA process, are important. These comments convey political sentiments and personal support for an alternative and the various provisions therein.</p>
<p>SUMMARY COMMENTS</p> <p>Ban snowmobiles or I support alternative 1a or I urge you to uphold the original decision (includes support for the provisions therein). May contain I object to the preparation of the Supplemental EIS.</p>
<p>The final rule should reflect alternative 1a.</p>
<p>I support alternative 1b and the provisions therein (includes support for snowcoaches).</p>
<p>I support mass transit snowcoaches.</p>
<p>I support alternative 3 and the provisions therein.</p>
<p>I do not support alternative 2 and the provisions therein.</p>
<p>I do not support alternative 3 or the provisions therein (e.g., guided trips).</p>
<p>Listen to the EPA! EPA says alternative 1a is the best alternative.</p>
<p>Not all residents of West Yellowstone support the use of snowmobiles in the parks.</p>
<p>Keep the status quo. No changes are necessary.</p>
<p>I do not support any of the alternatives (presented in the SEIS).</p>

ALTERNATIVE FEATURES
<p>GENERAL RESPONSE TO THE FOLLOWING COMMENTS:</p> <p>In general, expressions of support and opposition for features of an alternative appear to relate to the decision that the commenter would like to see the NPS make. The comments should be considered in making the final decision but there is nothing in those opinions that would substantially alter the range of alternative features to be considered in the FSEIS. For example if the features that are not supported were to be deleted from the range of alternatives then the analysis would be left only with features that the commenter agrees with. If only the actions that are supported by the commenter remain then there is effectively only one alternative. Accordingly, the commenter concludes that there is only one alternative that warrants consideration. From the NEPA standpoint the analysis cannot be limited in this fashion. Therefore, expressions of support or opposition will not be responded to by changes in the alternative features discussed in the SEIS, but they are listed here for the readers' information.</p>
<p>COMMENT:</p> <p>Eliminate snowmobiles until EPA imposes emissions standards that are as strict as those for cars.</p>
<p>RESPONSE:</p> <p>The range of alternatives considered examines a range of emission factors.</p>
<p>COMMENT:</p> <p>The parks should be open to foot travel only. No motorized use of any kind.</p>
<p>RESPONSE:</p> <p>An alternative that closes the parks to all road grooming was considered in the FEIS. Because it did not fulfill the stated purpose and need for the winter use plan it was not carried forward to analysis. The commenter is referred to Chapter I, Purpose and Need for Action (page 6) and Chapter II Alternatives Considered but Eliminated from Detailed Study (page 63) in the FEIS.</p>
<p>COMMENT:</p> <p>Until cleaner and quiet is guaranteed, no snowmobiles in the parks.</p>
<p>RESPONSE:</p> <p>The commenter is referred to alternatives B and D in the FEIS. These alternative elements remain available to the decision maker.</p>
<p>COMMENT:</p> <p>The first and last week that YNP is open should be nonmotorized use only.</p>
<p>RESPONSE:</p> <p>The commenter is referred to alternative 3 in the SEIS.</p>
<p>COMMENT:</p> <p>Reduce numbers OR ban snowmobiles.</p>

<p>RESPONSE:</p> <p>None of the SEIS alternatives, apart from 1a and 1b, reduce the total number of snowmobiles, except for alternative 3 at West Yellowstone. Caps are placed on use at a level higher than current use, overall in the three park units.</p>
<p>COMMENT:</p> <p>Government should provide incentives for businesses to convert to nonmotorized emphasis.</p>
<p>RESPONSE:</p> <p>NPS wishes to facilitate an ongoing effort to improve all motorized technology, thereby improving the opportunities for quality nonmotorized recreation as expressed in policy requirements.</p>
<p>COMMENT:</p> <p>Explore the use of bio-diesel (or alternative fuel) snowcoaches.</p>
<p>RESPONSE:</p> <p>NPS wishes to facilitate an ongoing effort to improve all motorized technology, including measures to decrease emissions and sound from snowcoaches.</p>
<p>COMMENT:</p> <p>NPS must analyze a no trail grooming alternative.</p>
<p>RESPONSE:</p> <p>This alternative was considered in the earlier FEIS process, but not carried through detailed analysis because it does not meet the expressed purpose and need for action.</p>
<p>COMMENT:</p> <p>Explore the use of monorail system.</p>
<p>RESPONSE:</p> <p>This alternative was considered in the earlier FEIS process, but not carried through detailed analysis because it would not be implementable now or in the foreseeable future. Cost and environmental impact are prohibitive.</p>
<p>COMMENT:</p> <p>Explore use of alternative mass transit vehicles like tundra buggies in Canada.</p>
<p>RESPONSE:</p> <p>All alternatives emphasize the need for improvement in snowcoach technology, including the development of a new generation snowcoach.</p>
<p>COMMENT:</p> <p>Set aside quiet use areas where only nonmotorized use is allowed.</p>
<p>RESPONSE:</p> <p>Much of the area in all three park units is allocated to nonmotorized use. See management zones 6, 7 and 8 in the SEIS alternatives. At issue is accessibility to these areas for the average nonmotorized recreation user, and the effect on this opportunity represented by snowmobiles and snowcoaches operating in motorized zones.</p>

<p>COMMENT:</p> <p>Improve crumbling infrastructure.</p>
<p>RESPONSE:</p> <p>This is beyond the scope of a winter use plan.</p>
<p>COMMENT:</p> <p>Monitor effects to assess the impacts of motorized use.</p>
<p>RESPONSE:</p> <p>Monitoring and adaptive management are key features of each alternative. The final decision should explicitly direct the implementation of monitoring and adaptive management programs for this purpose, and the approved use should be contingent upon this implementation.</p>
<p style="text-align: center;">ANALYSIS</p>
<p>COMMENT:</p> <p>Socioeconomic effects are miniscule. Businesses will adapt. An increase in nonmotorized users after the ban will more than offset any lost revenues.</p>
<p>RESPONSE:</p> <p>Business adaptation has been readily observable through past management changes or changes in park conditions such as those experienced following the 1988 fire season. NPS believes that a quality winter recreation experience is possible, and probable, should the existing decision be affirmed. Further, it would lend greater diversity to opportunities available from West Yellowstone, where the key economic issues reside.</p>
<p>COMMENT:</p> <p>Alternatives allowing snowmobiles are costly.</p>
<p>RESPONSE:</p> <p>Appendix F in the FEIS explores the cost to government for the alternatives evaluated in that document. Costs are separated for Yellowstone and for Grand Teton and the Parkway. In reviewing this information, it is evident that costs are much lower for Grand Teton and the Parkway without snowmobiles. For Yellowstone, the case is less clear. Costs are much lower in the alternative that eliminates all winter use in the northwest quadrant of the park (alternative F). Otherwise, alternative G (snowcoach only) is as costly as other alternatives allowing snowmobile use. The cost estimates provided in the FEIS do not adequately reflect expenses associated with monitoring and adaptive management. Information in the FSEIS will update this consideration.</p>
<p>COMMENT:</p> <p>Reduce snowmobile numbers.</p>
<p>RESPONSE:</p> <p>None of the SEIS alternatives (apart from 1a and 1b with snowcoach only access) reduce the number of snowmobiles, except for alternative 3 at West Yellowstone. Caps are placed on use by entrance, but at a level that allows greater use overall in the three park units.</p>
<p>COMMENT:</p> <p>Rarely is snowmobile access justified due to disability concerns.</p>

<p>RESPONSE:</p> <p>NPS agrees. It is evident that, considering the disabled population in general and considering very elderly or very young visitors, snowcoaches offer the best opportunity for winter access. A new generation snowcoach would incorporate state of the art design features for this population.</p>
<p>COMMENT:</p> <p>The park is too crowded due to snowmobiles.</p>
<p>RESPONSE:</p> <p>It is difficult to separate out the concept of crowdedness from the variety of impacts caused by snowmobiles in relation to visitor experiences of others. Impacts on visitor experience are described in the EIS, as are other impacts that contribute to the changes in visitor experience.</p>
<p>SUMMARY COMMENTS:</p> <p>Snowmobiles harm wildlife and wildlife habitat.</p>
<p>Snowmobiles threaten human health and safety</p>
<p>Snowmobiles pollute the air, ground, and water with unburned gas, oil, and CO.</p>
<p>Snowmobiles destroy natural quiet/peace/tranquility (concerned about noise)</p>
<p>Snowmobiles smell.</p>
<p>Snowmobiles destroy solitude.</p>
<p>Snowmobiles cause environmental or habitat destruction/damage (includes soil, water, plants, trees etc.)</p>
<p>Snowmobiles ruin the park experience for other visitors.</p>
<p>RESPONSE:</p> <p>Impacts for these topics are disclosed in the FEIS and SEIS.</p>
<p>COMMENT:</p> <p>Snowmobiles ruin the road surface by creating bumps/ruts.</p>
<p>RESPONSE:</p> <p>This impact is dependent, in general, upon the number of snowmobiles and snowcoaches that travel a road surface, the ambient temperature conditions, and the frequency of grooming. Both snowcoach travel and snowmobile use are made uncomfortable when bumps (moguls) and ruts are created. At some point the phenomenon also creates a safety problem.</p>

STATEMENTS OF OPINION AND EXPRESSIONS OF CONCERN

GENERAL RESPONSE:

Comments identified as general expressions of concern are not specific or substantive in nature as defined in the CEQ regulations (§1503.3 and §1503.4). Specifically they are not specific in regard to the analysis or the alternatives and they do not address the adequacy of the draft SEIS, the merits of the alternatives or provide additional relevant information that is within the scope of the purpose and need for action. They can generally be characterized as personal opinions on resources or park management, or other statements that would not be responded to by any change in the draft SEIS. It should be noted that for a great many of the comments that express general concern about resources or other impact topics, similar but more specific comments are recorded and responded to in their respective subject areas in other sections of this response document. Due to the large volume of comments, similar statements are grouped as summary comments and actual examples are provided. Where a comment doesn't fit in within a grouping, or it is sufficiently different from other comments, it is stated in the original word of the commenter.

The NPS wishes to emphasize that because a comment or comment category does not warrant a formal response under CEQ regulations does not reduce its importance to the process. NEPA is a decision making process designed to provide decision makers with a breadth of information on which to base a well reasoned decision. Public opinion, although not directly relevant to most analysis, is a key element to be considered by the decision makers.

The NPS would like to thank the all the commenters who took the time to share their thoughts and concerns in the many letters and emails received during the comment period. The body of comment received was notable not only because of its remarkable size but also in the high level of passion and conviction communicated by the commenters as well as their great concern for the well being of the three park areas.

SUMMARY COMMENT:

A number of commenters stated that the introduction of cleaner and quieter snowmobile technology would not address the adverse impacts sufficiently to allow them to operate in the parks. Noted concerns included effects of snowmobiles on wildlife, solitude and natural quiet. For example, "Cleaner and quieter snowmobiles, even if possible, still will not sufficiently reduce adverse impacts to the environment and wildlife. Nor will reduced numbers."

SUMMARY RESPONSE:

Providing opportunities for appropriate public enjoyment is an important part of the Service's mission. Other park uses that are unrelated to public enjoyment – may sometimes be allowed as a right or privilege - if law or regulation does not otherwise prohibit them. In exercising its regulatory authority the Service will allow only uses that are 1) appropriate to the purpose for which the park was established and (2) can be sustained without causing unacceptable impacts to park resources and values. Recreational uses that would impair park resources cannot be allowed. The only exception is when an activity is specifically mandated by Congress" (NPS Management Policies 2001).

<p>COMMENT:</p> <p>NPS should not expend additional money and time to prepare EISs, manage snowmobiles and restore damage caused by them. NPS should not waste any more money studying the issue!</p>
<p>RESPONSE:</p> <p>The SEIS process is being prepared in response to litigation. The commenters are referred to Chapter I of the SEIS, purpose and need.</p>
<p>SUMMARY COMMENT:</p> <p>Many people stated that park resources and values should be placed above the economic interests of gateway communities. Similarly, many people were concerned that local governments and communities were dictating the management policies of nationally owned resources. For example, "Local control of federally-owned lands is not justified." "Considering commercial interests above the parks' is not right." "I pay taxes to support the parks, not the snowmobile industry or business concerns." "NPS should not be pressured by the snowmobile industry or business concerns."</p>
<p>SUMMARY RESPONSE:</p> <p>The purpose and need for action, including a discussion of laws, regulations and executive orders that apply to winter use is presented in Chapter I of the SEIS and in Chapter I of the FEIS.</p>
<p>COMMENT:</p> <p>I will not come to the park unless the ban is enacted. I will not return to the parks until snowmobiles are removed.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>SUMMARY COMMENT:</p> <p>Many commenters stated that the NPS is in violation of laws (e.g., the Organic Act), regulations, and executive orders (e.g., 11644).</p>
<p>SUMMARY RESPONSE:</p> <p>The purpose and need for action, including a discussion of laws, regulations and executive orders that apply to winter use is presented in Chapter I of the SEIS and in Chapter I of the FEIS.</p>
<p>SUMMARY COMMENT:</p> <p>A number of opinions were expressed regarding the various opportunities available to snowmobilers near the three parks. Commenters stated that snowmobiling might be more appropriate in other areas. For example, "Snowmobiles belong on the National Forests and other places, not the national parks." There are plenty of other places where snowmobiling is allowed in the Yellowstone ecosystem". "Snowmobilers should recreate in areas not afforded the strict protection described in the Organic Act" "Snowmobiles are more destructive than other park activities. Snowshoeing and skiing are more compatible with the parks."</p>
<p>SUMMARY RESPONSE:</p> <p>See National Park Service Mandates, Chapter I in the SEIS and Chapter I of the FEIS.</p>

SUMMARY COMMENT:
Terminate trail grooming to protect bison and other wildlife. Bison leave the park on groomed roads and are shot by the livestock industry.
SUMMARY RESPONSE:
In the FEIS, NPS cites recent research and monitoring efforts in which bison use of groomed roads was shown to be relatively minor (Bjornlie 2000, Kurz et al. 2000), the SEIS updates that information. Whether or not groomed roads caused population growth, expansion, and range depletion is the subject of ongoing controversy and research. The SEIS contains a discussion of the pertinent issues. Research is currently being conducted to better understand the relationship between road grooming and bison movement and distribution patterns.
SUMMARY COMMENT:
Promotion of snowmobile use will lead to greater obesity.
RESPONSE:
No response necessary.
SUMMARY COMMENT:
Many commenters expressed a concern for the protection of park values. Highlighting these types of comments were memories of past visits to the parks and the commenters ability or inability to experience the sounds and smells of the parks in the wintertime. Other commenters stated that these intangible values were the very essence of a visit to the parks. Examples of these types of comments include: <ul style="list-style-type: none"> • If snowmobiling is the primary purpose of the trip, then snowmobilers are missing the point. • Please protect the park for future generations (children and grandchildren). • General concern for protection of park values (human refuge, exquisite quiet - spirituality etc.) • Please honor law, science and NPS professional opinion • Enable all Americans to enjoy our greatest National Parks and help make them clean, safe places where wildlife and natural sounds are undisturbed. • The parks should be allowed to rest in the winter. • If it keeps the parks healthy, I would be happy to forgo visiting the parks in the winter.
RESPONSE:
No response necessary
COMMENT:
Ensure the Grey wolf and American bison remain key species in Yellowstone ecosystem.
RESPONSE:
The commenter is referred to the purpose and need for action presented in Chapter I of the SEIS.
COMMENT:
Continue to give visitors the inspiring experience they want and deserve.

RESPONSE:
The commenters are referred to the purpose and need of the SEIS described in Chapter I.
COMMENT:
A number of commenters expressed the opinion that snowcoaches are a more desirable way to see the parks. For example, “Snowcoaches will minimize wildlife harassment, reduce noise and air pollution and protect visitor/employee health and safety.” “Snowcoaches allow families to travel together and enjoy scenery in relative peace and quiet.”
RESPONSE:
The effects of snowcoaches are disclosed under all impact topics in the SEIS and FEIS.
COMMENT:
Snowcoaches are less expensive to visitors than renting snowmobiles.
RESPONSE:
The NPS disagrees. The cost of renting a snowmobile is comparable to that of a snowcoach seat. While snowmobile riders must also incur the additional cost of renting appropriate clothing, it is also possible to ride double on a snowmobile, significantly reducing the cost on a per rider basis.
COMMENT:
Long-term economic viability is dependent in preserving YNP.
RESPONSE:
The NPS agrees.
SUMMARY COMMENT:
Many commenters expressed frustration at the number of times they had commented on the winter use issue. For example, “Further public comment is not necessary - there was an overwhelming amount of comments the first time around” “ Decision was based on sound science, public meetings, public comment.” This is the fifth letter I’ve written on this issue when are you going to listen?”
RESPONSE:
The NPS appreciates the public’s conviction and perseverance on this issue. The commenters are referred to the discussion of the purpose and need for the SEIS presented in Chapter I.
SUMMARY COMMENT:
The snowmobile industry has produced no new evidence that cleaner and quieter machines can be produced.
SUMMARY RESPONSE:
New 4-stroke machines are currently available for purchase. Each alternative assessed in the SEIS requires that the best available technology be in snowmobiles entering the parks, whether or not the industry has produced an adequate number of those vehicles.
SUMMARY COMMENTS:
Snowmobilers do not adhere to regulations
Snowmobiles go too fast.

Snowmobiles waste gas/energy.
Snowmobiles contribute to climate change.
RESPONSE: These statements are largely a matter of opinion, or are generalizations. NPS administrative functions are present to deal with the first two.
COMMENT: Extraordinary Yellowstone deserves extraordinary protection.
RESPONSE: NPS agrees.

SECTION 4: NON-FORM LETTER CONTENT AND RESPONSE

Approximately 11,700 non-form letters were received during the public comment period for the Winter Use Plans Draft Supplemental Environmental Impact Statement for Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Memorial, Jr., Parkway. Letters in this category are different from form letters in that the thoughts expressed in them were not part of a mass produced letter or postcard. Many commenters who sent in form letters also took the time to write additional thoughts or concerns. These additional expressions have been summarized in the comments listed below. The non-form letters generally expressed individual thoughts, concerns and experiences and for the most part did not contain relevant new information or scientific data that would necessitate changes in the FSEIS. While letters of this type are not of particular importance to the NEPA process they are of importance to the decision makers, particularly because in this instance, a primary reason for this SEIS process was to solicit additional public comment on the earlier decision.

The non-form letters were categorized by support for an alternative or alternative action. Approximately 9,107 letters supporting alternative 1a or 1b were received. Approximately 1,309 non-form letters supporting continued use of snowmobiles were received. Because of the large volume of letters received, comments that were expressed multiple times have been summarized. Whenever possible the actual words of the commenter have been retained.

Table C: Summary Comments from Non-Form Letters And Responses to Them

ALTERNATIVE FEATURES –EXPRESSIONS OF SUPPORT
<p>GENERAL RESPONSE TO THE FOLLOWING COMMENTS:</p> <p>In general, expressions of support and opposition appear to relate to the decision that the commenter would like to see the NPS make. The comments will be considered in making the final decision but there is nothing in those opinions that would substantially alter the range of alternative features to be considered in the FSEIS. For example if the features that are not supported were to be deleted from the range of alternatives then the analysis would be left only with features that the commenter agrees with. If only the actions that are supported by the commenter remain then there is effectively only one alternative. Accordingly, the commenter concludes that there is only one alternative that warrants consideration. From the NEPA standpoint the analysis cannot be limited in this fashion. Therefore, expressions of support or opposition will not be responded to by changes in the alternative features discussed in the SEIS, but they are listed here for the readers' information.</p> <p>The purpose for preparing this SEIS, as agreed to in the settlement agreement and as published in the Federal Register Notice of Intent includes the soliciting of more public comment on the earlier decision. Because of the desire on the part of the decision makers to receive additional information from the public these types of comments, while not particularly applicable to the NEPA process, are important. These comments convey political sentiments and personal support for an alternative and the various provisions therein.</p>
Ban snowmobiles.
I support alternative 1a.
I urge you to uphold the original decision (includes support for the provisions therein).
I do not support alternative 2 and the provisions therein.
I support alternative 1b and the provisions therein (includes support for snowcoaches).

I support mass transit snowcoaches.
I support alternative G as described in the FEIS
Not all residents of West Yellowstone support the use of snowmobiles in the parks.
I support alternative B in the FEIS.
Snowmobiles should not be allowed in national parks.
I object to the snowmobile ban.
I support mass transit buses for winter travel in the parks.
I do not agree that only 4-stroke snowmobiles should be allowed in the parks.
I support alternative 2 developed by the Cooperating Agencies.
I support alternative 2 (with minor change)
I support the general concepts in alternative 2.
I support alternative 2 and oppose all the other alternatives.
I do not support any proposal for snowmobiles to be prohibited entry to the parks.
I support reasonable restrictions on snowmobiles. Rely on proper management rather than banning snowmobiles (drastic measures).
I oppose alternative 3 concepts such as guided use only, closure to snowmobiles after Presidents Day/330 machine cap.
I do not support any of the alternatives presented in the SEIS.
I agree with the EPA. EPA says that alternative 1a is the best alternative for ensuring the protection of the natural parks and the visitors experience.
Keep snowmobiles in the parks.
I support the original decision or I urge you to uphold the original decision.
I support alternative 3 and the provisions therein.
GENERAL RESPONSE TO THE FOLLOWING COMMENTS: Many people focused on the features of alternatives that they favored and many focused on those features to which they were opposed. Like expressions of support for an overall alternative these comments are of importance to decision makers but do not warrant a formal response as provided in NEPA (see § 1503.4). All the alternative features presented in the FEIS and DSEIS remain available for selection by decision-makers. Expressions of support are not responded to individually but are provided here as information for the reader.
I support eliminating high use peak days that have led to over- crowding during holidays. Manage these by a reservation system or by a daily cap.
I do not support limits or advance permit sales, but support more rangers for security purposes.
I do not support any proposal for snowmobile access only with a guide.
I support interim daily entry limits for snowmobiling, based upon historic daily averages.
I support strict enforcement of speed limits and existing laws and regulations.
I support the use of a 35-mph speed limit between West Yellowstone and Old Faithful.
I support adaptive management so parks can be responsive to new technology.
I support advance sale of park permits, but they should be larger and more visible.
I support pilot program features including advance sale of permits and increased numbers of rangers.

I support tighter controls, (e.g., guided trips only, permits).
I support interim daily entry limits for snowmobiling, based upon historic daily averages, mid-Dec until mid-March, until a long-term capacity study is completed.
I support interim daily entry limits for snowmobiling, based upon historic daily averages, until a long-term capacity study is completed.
Keep the status quo. No changes are necessary.
I believe 75 dB is a reasonable level at which to regulate snowmobile sound, as it is half as loud as the current reg.
I believe 75 dB is a reasonable level at which to regulate snowmobile sound.
I believe in regulating sound at a reasonable level.
Historic annual use levels should be maintained.
New snowmobile technology and proper park management (dispersion and regulations) are sufficient to solve snowmobile-related problems.
There are lots of places besides national parks that snowmobiles can operate. Snowmobiles should be limited to the national forests, BLM, and other private and state lands.
Snowmobile and snowcoach use can coexist. One use should not be banned.
The old bombardier snowcoaches should be banned immediately. They are too polluting.
I am an avid snowmobiler and I believe that snowmobiling is an inappropriate use in the parks.
Eliminate snowmobiles until EPA imposes emissions standards that are as strict as those for cars.
Historic visitor use should be maintained in support of individual use preference.
Eliminate road grooming in the parks.
We support the following concepts: A reservation system with daily entry limits based on historic daily averages, until a carrying capacity study is complete; EPA should regulate emissions; increase nonmotorized groomed trails, expand educational opportunities; sell park passes in advance.
I oppose the snowmobile ban and support Alternative 2.
I support freedom of access by multiple user groups.
We fully support the original winter use plan and decision that banned recreation snowmobiling from YNP and GTNP.
I support closing the parks to all winter use.
Modern rubber tracked snowcoaches should be the only type of snowcoach allowed in the parks.
Monitor the effects of motorized use.

ALTERNATIVE FEATURES

GENERAL RESPONSE

Many suggestions for alternative features made by commenters have already been incorporated in one or more of the alternatives presented in the DSEIS or the FEIS. Some of these suggestions were slight variations of alternative features included in the DSEIS or the FEIS. It is important to note that numerous suggestions for alternatives and alternative features were made in the many thousands of comments received. It is clear that for such complex issues that an infinite number of possible alternative features and combination of features could be developed. CEQ regulations require that in such instances, the agency need only consider a reasonable number or examples that cover the full spectrum of possible alternatives that meet the purpose and need for action. (Question 1b, CEQ 40 Most Often Asked Questions.) What constitutes a reasonable range depends on the nature of the proposal and the facts in each case where the proposal is at the discretion of agency.

The winter use plan is intended to be a programmatic plan. It is intended to make decisions at a general level and defer many site-specific or implementation types of decisions to a later date (much like an NPS General Management Plan or a USFS Forest Plan). In addition to general decisions, programmatic plans and EISs may contain (as alternative features) processes that would be followed such as adaptive management or advisory committees. In a programmatic document it is also appropriate to examine whether certain management activities are contributing to an issue or problem relevant to the plan. These types of features (for example, lower speed limits) may appear to be solely implementation strategies and not appropriate for inclusion in a programmatic document. The important distinction, from a programmatic perspective, is that in some cases a smaller or more specific feature such as speed limits may affect a programmatic issue such as natural soundscapes or health and safety. The question for the programmatic analysis is not whether 35 or 45 is the safest or quietest speed, but whether oversnow vehicle speed is a significant contributor to vehicle accidents, collisions with wildlife or results in adverse effects on the natural soundscape or visitor experience.

Many people focused their comments on the features of alternatives that they favored and may focused on those features to which they were opposed. As stated above, while this information is important to relay to decision makers it does not warrant a formal response under CEQ regulations (see § 1503.4).

SUMMARY COMMENT:

The NPS should put the same effort into developing clean, quiet and comfortable snowcoaches as it says it is putting into developing better snowmobiles. They should be cleaner and quieter, have room for storage, be accessible to all persons, have adequate window defrosters etc.

SUMMARY RESPONSE:

All alternatives analyzed in the SEIS and alternative G in the FEIS would require that all snowcoaches entering the parks use the best available technology. In addition, NPS has been an active partner in developing new mass transit vehicles that would be equipped for winter travel. The NPS agrees that there is significant room for improvement in current snowcoach comfort, and in lowering emissions and sound levels. The NPS also agrees with the commenter that these improvements are essential if snowcoaches are to be a primary mode of travel in the parks. In addition, the cost of snowcoach travel must be made more affordable

COMMENT:
Until cleaner and quiet is guaranteed, no snowmobiles in the parks.
RESPONSE:
Cleaner and quieter technologies would be required under all alternatives examined in the SEIS and in alternatives B, D, F and G in the FEIS.
COMMENT:
Government should provide incentives for businesses to convert to nonmotorized emphasis.
RESPONSE:
The Record of Decision prepared in November of 2000 stated that the NPS would work with gateway communities to develop and implement a new marketing strategy for winter recreation in the parks. The marketing strategy was to include snowcoach and nonmotorized winter recreation opportunities.
COMMENT:
Travel on roads in YNP should be discouraged from 8 PM to 7:30 AM.
Travel on roads in YNP should be discouraged from 8 PM to 8 AM.
Travel on roads in YNP should be discouraged from 10 PM to 6 AM.
Travel on roads in the parks should be discouraged from 11 PM to 5 AM
Travel on roads in the parks should be discouraged after 5 PM until 5:30 AM
RESPONSE:
The NPS appreciates the thoroughness of the many comments received regarding nighttime closures in YNP. The range of closures suggested by the commenters is covered in alternatives B, D, E, G in the FEIS and in alternatives 1a and 1b, 2 and 3 in the SEIS.
COMMENT:
Explore the use of bio-diesel (or alternative fuel) snowcoaches.
RESPONSE:
The Record of Decision for the Winter Use Plans for Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway states that through the permitting process the NPS will phase out all oversnow vehicles that do not meet the best available environmental technology. Any mass transit system in the parks must be low emissions, safe, quiet, affordable, and accessible and comply with the requirements of EO 11644.” This would include the use of alternative fuels where appropriate. In implementing this decision YNP plans to make bio-diesel available to all vehicles
COMMENT:
Increase groomed nonmotorized trails and numbers/size of warming huts to mitigate “perceived” user conflicts.

RESPONSE:

Several alternatives examined in the FEIS include an increase in size and number of warming huts. This action item is also included in alternatives 1a, 1b, 2 and 3 in the SEIS and is available for selection by the decision maker. Because the scope of the SEIS is limited to an examination of the effects of new snowmobile technologies increasing the number of nonmotorized trails was not considered within the scope of this document. The commenter is referred to pages 5-6 of the Record of Decision for a listing of areas to be groomed for nonmotorized use in the parks in future winter seasons.

COMMENT:

The NPS must analyze an alternative that eliminates road grooming in the parks. Other comments received in this category include a desire to see the park closed to all motorized use.

RESPONSE:

The purpose and need of the SEIS (pages 4-5) as agreed to in the settlement and as published in the Federal Register Notice of Intent, is as follows. The preparation of a supplemental EIS is deemed necessary to further the purposes of the National Environmental Policy Act (NEPA), which includes: 1) soliciting more public comment on the earlier decision and alternatives to it, 2); consideration of additional information from the International Snowmobile Manufacturers Association; and 3) consideration of other significant and relevant new or updated information not available at the time of the earlier decision. The inclusion of a no trail-grooming alternative was dismissed from further consideration in the original FEIS (see page 63). Several of the alternatives presented in the original FEIS suggest closing areas of the park to all human use. In terms of issues and impacts the NPS sees no reason to suggest further closures. If in the future the results of adaptive management should suggest otherwise, then additional areas of the parks may be closed.

COMMENT:

Explore other nonmotorized methods of travel in the parks like dog sledding or horse drawn sleighs.

RESPONSE:

The commenter is referred to the discussion of the purpose and need for the SEIS described above. Because the scope of the document is limited to significant and new relevant information new nonmotorized uses were not examined in this SEIS. In the EIS, park wide access to dog sledding and horse drawn sleighs were not evaluated in detail because these uses would be unsafe when combined with motorized travel and not practical as a primary mode of transport through the parks. Localized use of sleighs or sleds is an issue that is better addressed within YNP's ongoing concession management planning. Actions such as these would require site-specific analysis to evaluate the effects of these uses on the health and safety of park visitors and employees and the effects these uses may have on wildlife.

COMMENT:

Sound regulations should be established through an appropriate process using the Society of Automobile Engineers (SAE) test protocols.

RESPONSE:

Regulations for the NPS must be promulgated through a legally required process that includes publication in the federal register and public comment. It is unclear how the SAE testing protocols would be appropriate for establishing regulation. If it can be assumed that the commenters intended to suggest that SAE test protocols be used to monitor sound levels or to set standards for sound levels, the NPS agrees that the SAE testing protocols may be a useful implementation or monitoring tool. The SAE protocols may be one tool used in *setting* a sound standard or in monitoring vehicle sound to ensure that vehicles entering the parks comply with the regulation. If the commenter is suggesting that the SAE protocols are the only method to accurately measure sound levels, the NPS respectfully disagrees. In addition to the loudness of vehicles it is also important to assess audibility. Audibility is assessed in terms of distances to the limits of vehicle audibility, acres of land affected by audible vehicle traffic and the percentages of time that vehicles are audible in sections of parkland. The distance of the limit to audibility depends on both the background (ambient sound level) and the rate at which sound drops off with distance, and calculations for different background sound conditions and different terrain types. It is also important to evaluate the average magnitude of sound from vehicles. Acceptable limits on sound will vary by management zone type within each park.

COMMENT:

Plow the roads in the Parks and implement a mass transit bus system.

RESPONSE:

See alternative B in the FEIS.

COMMENT:

Allow snowmobiles in the already compromised areas of the parks (5%).

RESPONSE:

The NPS suggests that there should be no areas that are “compromised” in the national parks.” Law and policy allow for areas of visitor use and services but they must take place in such a manner as to leave these lands unimpaired for the enjoyment of future generations. All park uses must be evaluated for their:

- 1) Consistency with applicable laws, Executive Orders, regulations and policies,
- 2) Consistency with existing plans for public use and resource management.
- 3) Actual and potential effects on park resources and values.
- 4) Total cost to the Service, and whether the public interest will be served.

The NPS maintains that it is possible for numbers of visitors to enjoy the parks without compromising the natural resources and values contained therein. Because the purpose and need for the SEIS and FEIS is in part to determine safe, high quality and appropriate winter recreation opportunities the suggestion to allow “snowmobiles in an already compromised area of the parks is clearly outside the scope of this SEIS.

COMMENT:

Cleaner emission requirements should be phased in over a period of years (2-5).

RESPONSE:

The commenter is referred to the descriptions of alternatives 2 and 3 in the SEIS, in which “phase-in” is discussed.

COMMENT:
Set aside quiet use areas where only nonmotorized use is allowed.
RESPONSE:
The NPS appreciates the comment. The majority of nonmotorized trails are separated physically from motorized traffic. In Yellowstone, roads are primarily throughways. They connect one gateway community with another. Because the roadways transect the park, zoning nonmotorized uses away from the sound of winter-motorized uses (with today's technology) is nearly impossible. In Grand Teton, the situation is somewhat different. By closing the Teton Park Road and the frozen surface of Jackson Lake to motorized traffic, zones of nonmotorized use are effectively separated from the sound of snowmobiles. Several alternatives in the FEIS address this suggestion; the commenter is referred specifically to alternative D.
COMMENT:
Set aside a use area where only motorized use is allowed.
RESPONSE:
See above response.
COMMENT:
Reduce snowmobile numbers.
RESPONSE:
See alternative 3 in the SEIS.
COMMENT:
Monitor effects to assess the impacts of motorized use.
RESPONSE:
All alternatives in the SEIS and FEIS include monitoring the effects of winter use in parks.
COMMENT:
Cleaner emission requirements should be phased in over a period of years (2-5).
RESPONSE:
See descriptions of alternatives 2 and 3 in the SEIS and alternatives B and D in the FEIS.
COMMENT:
Only 4-stroke snowmobiles should be allowed.
RESPONSE:
Currently the best available technology for producing fewer emissions happens to be 4-stroke snowmobile technology. However, in the future, new technologies may be developed that lower both sound and exhaust emissions from snowmobiles using different technology. The NPS does not wish to limit the options for better technology, and would encourage continuing efforts for improvement on all fronts.
COMMENT:
Disperse snowmobile use on existing routes and add new routes by grooming existing roads.

RESPONSE:

The great majority of roads that currently traverse the parks are groomed for snowmobile use in the winter. Most routes that are currently plowed are those that provide essential wheeled vehicle access to communities such as Cooke City, West Yellowstone and Moran. The exception is maintaining a plowed route into Flagg Ranch in the John D. Rockefeller, Jr., Memorial Parkway, which will be discontinued under the existing decision. One way to disperse snowmobile numbers in the parks is to limit the number of vehicles allowed through each gate. The commenter is referred to the interim limit levels suggested in alternatives 2 and 3.

SUMMARY COMMENTS:

Some commenters suggested, “if snowmobiles are to be allowed please give those of us seeking a quiet and clean experience at least 1 week at the end of the season to enjoy the type of experience we are seeking. It seems that 1 week out of the winter season is not too much to ask. Other commenters stated that “granted, alternative 3 allows for a period of snowcoach only access – however it is provided at the end of the season when the roads of the park are frequently closed because of poor road and snow conditions”.

SUMMARY RESPONSE:

Alternative 3 allows for a period of about 2 weeks for snowcoach and nonmotorized travel only, beginning the Friday after Presidents day weekend. This is a period of marginal winter character and marginal groomed trail quality, coinciding with road plowing beginning from the north side of YNP. The State of Wyoming commented on this issue by stating that “There is no justifiable reason for a closure to snowmobiles other than pure bias against motorized use.” However, a large portion of the commenting public expressed a desire for a winter snowcoach only experience in the parks without the sound and smell of snowmobiles. It appears that the bias is not against motorized use per se, but against the effects of certain types of motorized vehicles on the experience of some visitors. The NPS believes that the action provided in alternative 3 addresses, to a small degree, the concerns and desires expressed by a majority of people who commented.

COMMENT:

Control use by lottery, use limits, daily closures. Screen all users/operators’ driving and criminal records – withhold permits as needed.

RESPONSE:

A permit lottery, use limits and daily closures are all legitimate strategies for implementing daily use limits. Commenters are referred to the implementation strategy sections of the alternatives in the SEIS. The screening of criminal records for all persons who enter the parks is neither reasonable nor practicable.

COMMENT:

Develop better technology (scanners or something) to monitor if air quality is really affected.

RESPONSE:

The commenter is referred to the methodologies and assumptions sections for air quality of the FEIS (pages 206-211) and the SEIS (pages 170-204) for technologies utilized the air quality analysis. The adaptive management provisions of all the alternatives in the DSEIS require that monitoring of air quality continue in the parks.

COMMENT:
1:1 ratio of snowmobiles to law enforcement needed to adequately patrol and enforce regulations.
RESPONSE:
While the NPS agrees with the commenter that the above action would likely ensure compliance with regulations and appropriate behavior around wildlife. It would limit visitor access to an unacceptable level or be fiscally infeasible. On the other hand, NPS proposes the use of NPS-permitted guides as a requirement for entering the parks. This provision would ensure the use of best available snowmobile technology, and provide adequate control of numbers and visitor behaviors.
COMMENT:
Only solar powered snowmobiles allowed in parks.
RESPONSE:
To NPS' knowledge, a solar power snowmobile has not been manufactured and the commenter has provided no additional information regarding the existence of such a machine. In light of the lack of sunshine on most winter days in Yellowstone and Grand Teton, the NPS believes that great challenges face the designers of these vehicles. The commenter is referred to the discussion of electric snowmobile technology in the SEIS.
COMMENT:
Make it mandatory for all snowmobilers to first attend a wildlife respect and safety class. This could be done in the park.
RESPONSE:
Additional education is an integral part of nearly all the alternatives analyzed in the FEIS and SEIS. The commenter is referred specifically to the "implementation strategies outlined in alternative 2 of the SEIS.
COMMENT:
Keep snowplanes on Jackson Lake. They cause no environmental damage and provide access for many senior citizens.
RESPONSE:
NPS records indicate that there are approximately 80 snowplanes that have been permitted annually to operate within Grand Teton National Park. The effects of snowplanes are documented in the FEIS Chapter 4. This is outside the scope of the SEIS.
COMMENT:
The old bombardier snowcoaches should be banned immediately. They are too polluting.
RESPONSE:
The original decision on the FEIS selected alternative G. One of the action items included in alternative G was the use of only the best available technology in snowcoaches. A phase out of the louder and more polluting machines was also included. This action item remains available to the decision makers in the SEIS process.

<p>COMMENT:</p> <p>Cooperating partnerships should be developed to expand resources for education, with emphasis on ethics, rules, safety and park appreciation.</p>
<p>RESPONSE:</p> <p>NPS agrees. Some of these partnerships are established.</p>
<p>COMMENT:</p> <p>The first and last week that YNP is open should be nonmotorized use only.</p>
<p>RESPONSE:</p> <p>Both of these are available to the decision maker when making the final decision.</p>
<p>COMMENT:</p> <p>Explore the use of alternative mass transit vehicles like tundra buggies in Canada.</p>
<p>RESPONSE:</p> <p>The commenter is referred to the definitions of snowcoaches and snowmobiles presented under actions common to all alternatives in the SEIS. Currently very large vehicles cannot be easily accommodated on either parks road system. However, in the future the NPS may examine any type of oversnow vehicle that provides safe, low emission, comfortable travel in the parks.</p>
<p>EFFECTS ON PARK VALUES, VISITOR EXPERIENCE AND NATURAL RESOURCES BY TOPIC</p>
<p>GENERAL</p>
<p>COMMENT:</p> <p>New 4-stroke technology takes away most of the “perceived” environmental concerns.</p>
<p>RESPONSE:</p> <p>The analysis of 4-stroke snowmobile technology is discussed in detail in Chapter IV of the SEIS. Adverse effects of snowmobiles are demonstrated in both the FEIS and the DSEIS. New snowmobile technology does not address all the types of effects that are disclosed in both documents.</p>
<p>COMMENT:</p> <p>Impacts of snowcoaches are understated in the SEIS and should be reevaluated.</p>

RESPONSE:

The SEIS is not a referendum on snowcoaches, or a competition between snowcoach versus snowmobile use. The stated purpose for the SEIS is to evaluate new snowmobile technology, and how it may mitigate impacts of current snowmobile use on the three park units. NPS notes that snowcoach emissions may be overstated. The analysis thus far has encouraged the use of factors that liberally estimate impacts due to snowcoaches, and conservatively estimate the impacts of snowmobiles. That is, “best available technology” (BAT) is used for snowmobiles but not for snowcoaches. NPS, by necessity due to time allotted for this process and lack of field-specific data, used factors that were most representative of the current snowcoach fleet – these being liberal in terms of impacts. A comprehensive evaluation of options available for assuming emission factor inputs has been accomplished. The results are to be reflected in air quality modeling for both snowcoaches and snowmobiles. The FSEIS will attempt to balance the view of snowmobiles and snowcoaches in terms of BAT. Regarding air quality, the single-most relevant factor in reducing impacts on air quality, parkwide, is to reduce the number of machines.

COMMENT:

Cleaner and quieter snowmobiles even if possible still will not sufficiently reduce adverse impacts to the environment and wildlife. Nor will regulated numbers.

RESPONSE:

The NPS agrees that cleaner and quieter technologies alone do not address the full range of issues presented in the FEIS and SEIS. Other mitigating action items have been suggested and analyzed in the documents these items include use of guided tours only, significantly reduced numbers of vehicles, and increased law enforcement and education opportunities. All these action items remain available to the decision makers in the SEIS process.

COMMENT:

Snowmobiles are more destructive than other park activities. Snowshoeing and skiing are more compatible with the reasons that the park was created.

RESPONSE:

The NPS appreciates this comment. However, activities such as snowshoeing and skiing are not without adverse effects on the natural environment, particularly on ungulate species.

COMMENT:

Only disabled people should be allowed to snowmobile in the parks.

RESPONSE:

The National Park Service has a legal obligation to make available equal opportunities for people with disabilities in all programs and activities. NPS policy states: “In meeting the goal of accessibility emphasis will be placed on ensuring that persons with disabilities are afforded experiences and opportunities along with other visitors, to the greatest extent reasonable. Separate facilities for people with disabilities are not a substitute for full accessibility to other park facilities but they may be allowed where the need for specialized services is clearly demonstrated.” If the final decision in the SEIS were to allow only snowcoaches in parks as proposed in alternatives 1a and 1b, it would be unlikely that a separate snowmobile program would be developed only for persons with disabilities. Doing so would be outside of both the intent of the Americans with Disabilities Act (ADA) and NPS policy. If a snowmobile program is operational in the parks as has been suggested under alternatives 2 and 3 then the NPS will make every effort to provide universal access to that mode of transportation

COMMENT:

There is no evidence that users will voluntarily buy cleaner machines. How will you enforce the new standards?

RESPONSE:

Alternatives 2 and 3 require that only snowmobiles meeting certain standards would be allowed in the parks. People who do not own a compliant machine may rent one. Alternative 3 would allow snowmobiles to enter the park with a permitted guide under the direction of a concessions contract. By the terms of the contract, the NPS can require the concessionaire to operate only cleaner and quieter machines (as defined through existing best available technology).

COMMENT:

Snowmobiles have peacefully coexisted with the environment for decades.

RESPONSE:

The NPS disagrees. A review of lawsuits, planning efforts and regulations indicate that whatever the final decision may be concerning snowmobiles, the history of snowmobiling in the parks could not be viewed as peaceful coexistence. The commenter is referred to the analysis of environmental effects in Chapter IV, the background of the planning process described in the DSEIS and the discussion of public comment in this volume.

COMMENT:

Alternative 3 will compel manufacturers to use new technology for cleaner and quieter machines.

RESPONSE:

No response necessary.

COMMENT:

If you require only “best available technology” then the manufacturers have no reason to develop cleaner machines.

<p>RESPONSE:</p> <p>The NPS agrees. However, by reducing numbers of snowmachines in the parks until an appropriately clean and quiet machine is produced would provide incentives for improvements in technology. Also, NPS hopes to define BAT in a way that makes future access contingent upon continual improvement.</p>
<p>COMMENT:</p> <p>New technology takes away most of the perceived pollution or other concerns.</p>
<p>RESPONSE:</p> <p>The analysis of 4-stroke snowmobile technology is discussed in detail in Chapter IV of the SEIS. Adverse effects of snowmobiles are demonstrated in both the FEIS and the DSEIS. New snowmobile technology does not address all the types of effects that are disclosed in both documents.</p>
<p>COMMENT:</p> <p>Snowcoaches are judged unfairly. The NPS should put the same effort into developing clean, quiet and comfortable snowcoaches as it says it is putting into developing better snowmobiles.</p>
<p>RESPONSE:</p> <p>The NPS agrees that clean, quiet and comfortable snowcoaches are necessary in order to provide quality visitor access into the parks in the winter. The NPS is putting the same effort into encouraging the development of new snowcoaches. The existing decision phases out snowcoaches that do not meet stated standards. NPS has stated its intent to facilitate the development of a new generation snowcoach, while requiring in the interim the use of best available technology, such as that provided by rubber tracked vans.</p>
<p>COMMENT:</p> <p>Snowmobiles cause environmental or habitat destruction/damage (includes soil, water, plants, trees etc.).</p>
<p>RESPONSE:</p> <p>The effects of snowmobiles on park resources and values are disclosed in Chapter IV</p>
<p style="text-align: center;">AIR QUALITY</p>
<p>COMMENT:</p> <p>Snowmobiles produce fewer emissions than cars, particularly the great numbers of cars that visit the parks in the summertime.</p>
<p>RESPONSE:</p> <p>The effects of snowmobile emissions on the parks are disclosed in the air quality section in Chapter IV.</p>
<p>COMMENT:</p> <p>Many commenters were concerned about the effects of snowmobiles on air quality. Specific impacts of concern were:</p> <ul style="list-style-type: none"> • Snowmobiles pollute the air, ground, and water with unburned gas, oil, and CO. • Snowmobile fumes are pervasive. Snowmobiles smell, etc. • Snowmobiles waste gas/energy.

RESPONSE:
The effects of snowmobile emissions on the parks are disclosed on pages 199-483 in the FEIS and in the air quality section in Chapter IV.
COMMENT:
The old bombardier snowcoaches should be banned immediately. They are too polluting.
RESPONSE:
The existing decision phases out snowcoaches that do not meet stated standards. NPS has stated its intent to facilitate the development of a new generation snowcoach, while requiring in the interim the use of best available technology, such as that provided by rubber tracked vans.
COMMENT:
Cleaner and quieter snowmobiles are not necessarily clean and quiet snowmobiles.
RESPONSE:
NPS agrees. The commenter is referred to the analysis of alternatives in the SEIS. Alternative 3 proposes only to begin with reduced numbers of snowmobiles that utilize the cleanest and quietest technologies that are available today. Conceivably as snowmobiles that are manufactured that emit reduced levels of sound and pollutants greater numbers of them would be allowed to access the parks. This alternative will remain a choice for decision makers
NATURAL SOUNDSCAPES
COMMENT:
Snowmobiles destroy natural quiet/peace/tranquility (concerned about noise). The sound or whine of snowmobiles is annoying/can be heard for long distances. Snowmobiles destroy solitude.
RESPONSE:
The effects of snowmobiles on the natural soundscape are presented pages 220 to 251 of the DSEIS and for each FEIS alternative between pages 262 and 427 in the FEIS.
COMMENT:
Because of the sound of snowmobiles, solitude is unavailable in Yellowstone in the winter, even when skiing in the backcountry.
RESPONSE:
See previous response.
COMMENT:
The current 4-stroke machines are not quiet enough.
RESPONSE:
See previous response.
COMMENT:
Snowmobiles are not noisy.
RESPONSE:
See previous response.

PUBLIC AND EMPLOYEE HEALTH AND SAFETY
<p>COMMENT:</p> <p>Snowmobile emissions threaten the health of park employees.</p> <p>Snowmobilers do not follow park regulations. Snowmobiles go too fast. Snowmobilers often operate their machines off the roadway.</p> <p>Snowmobiles threaten human health and safety.</p> <p>Park employees should not have to wear gas masks to do their jobs.</p>
<p>RESPONSE:</p> <p>The effects of snowmobiles on the health and safety of employees and park visitors are presented pages 163 to 170 of the DSEIS and for each FEIS alternative between pages 229 and 413 in the FEIS. Further discussion of public health and safety for each alternative occurs in the air quality effects and water resource effects sections.</p>
<p>COMMENT:</p> <p>The employees wearing gas masks at the West Entrance should be fired for pulling such a political stunt.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>Matracks vehicles make deep unsafe cuts on groomed trails.</p>
<p>RESPONSE:</p> <p>The source of this comment is an assertion by the State of Wyoming in its comments, based on observations from a joint sound measurement study at the end of the last winter season. Just prior to the study, the Wyoming representative expressed considerable concern about the warm temperatures and the consequent inability of the groomed surface to hold up. It is disingenuous to use such information to discredit snowcoaches as a mode of access in order to support the use of snowmobiles. It may be appropriate to note that snowmobiles similarly damage groomed surfaces, depending upon the temperature, the amount of use, the power of the machine, and driver performance.</p>
SOCIOECONOMICS
<p>SUMMARY COMMENTS:</p> <p>Many commenters expressed that the snowmobile ban would be too devastating on the economies of small communities. Conversely, other commenters believed that the socioeconomic effects of allowing only snowcoaches into the parks would be minuscule and that businesses would adapt to the new market.</p> <p>Some specifically stated that an increase in nonmotorized users after the ban will more than offset any lost revenues. Many commenters were sympathetic to economic hardships that would be experienced by gateway communities but still felt that the protection of the parks should remain the paramount concern.</p> <p>Finally, some commenters felt that a clean and quiet park in the winter would attract a greater number of park visitors more than offsetting the economic impact of the loss of snowmobiling business.</p>

RESPONSE:

The effects of snowmobiles on the social and economic environment are presented on pages 146 to 162 of the DSEIS and for each FEIS alternative between pages 225 and 409 in the FEIS.

COMMENT:

The costs of the loss of recreation opportunities have not been disclosed. What are the costs of the loss of opportunities to experience clean air and quiet and undisturbed wildlife in the three parks?

RESPONSE:

Many people who commented on the SEIS stated that the economic analysis must include an assessment the environmental costs associated with snowmobiling. The environmental cost assessment would include the cost of pollution and its impact on air quality, vegetation, ecology or visitor experience. Similar statements were made about calculating the economic costs of harassment or disturbance to wildlife, and the removal of bison when they leave the park (presumably due to the existence of groomed roads). Such issues are partially answered by the assessment of non-market values, that is, the willingness to pay for clean machines or viewing of wildlife. Readers could view economic impacts as the cost of reducing impacts on resources. However, for many people the issue is instead related to the “intrinsic” value of the resource, not its value as an experience for people.

The response to such comments is two-fold. First the National Environmental Policy Act (NEPA) does not require a “particularized assessment of non environmental impact”, or “particularized economic analysis” in looking at the effects on the quality of the human environment. Second, NEPA, does not require an assessment of impacts for which no data can be acquired, or which is essentially speculative. The CEQ regulations do require evaluation of ecological, aesthetic, historic, cultural, economic, and social and health impacts. They do not require that everything be put into an economic or dollar value context. That is, it is necessary to reveal possible impacts on wildlife and unnecessary to put a dollar value on them. The analysis needs to be sufficient for the decision to be made and no more. In this instance, the decision to be made should not rest entirely on economic criteria; the issues to be resolved lie largely in the areas of effects on natural resources and visitor experience. Purely economic effects must be disclosed and will be considered as part of the decision process. The NPS appreciates the commenters’ logic. From an analytical perspective, it does make sense to evaluate all the costs of a proposed action. In this case, to speculate on a dollar value for personal enrichment, growth and the ability to experience wild places and creatures in their native habitat would be highly speculative and presumptive. For others it would be just as presumptive to apply a dollar value on the preservation of our nation’s natural wonders that many consider priceless.

COMMENT:

The cost of restoration of the damage that snowmobiles cause is too high.

RESPONSE:

Such costs are highly subjective. For the most part, impacts due to snowmobile use are eliminated by removing them from the parks.

COMMENT:

The SEIS analysis of socioeconomics was insufficient because it was too broad and not community specific.

RESPONSE: Community specific analysis will be presented in the FSEIS.
VISITOR EXPERIENCE
SUMMARY COMMENT: Snowmobiles ruin the park experience for other visitors.
RESPONSE: Impacts on visitor experience are disclosed in the FEIS and the SEIS.
COMMENT: Snowmobiles ruin the opportunity to study animals in a natural state in the winter.
RESPONSE: Impacts on visitor experience and wildlife are disclosed in the FEIS and SEIS.
COMMENT: Snowmobiles ruin the road surface by creating bumps/ruts.
RESPONSE: This impact is dependent, in general, upon the number of snowmobiles and snowcoaches that travel a road surface, the ambient temperature conditions, and the frequency of grooming. Both snowcoach travel and snowmobile use are made uncomfortable when bumps (moguls) and ruts are created. At some point the phenomenon also creates a safety problem.
COMMENT: The park is too crowded – because of the effects of snowmobiles.
RESPONSE: It is difficult to separate out the concept of crowdedness from the variety of impacts caused by snowmobiles in relation to visitor experiences of others. Impacts on visitor experience are described in the EIS, as are other impacts that contribute to the changes in visitor experience.
COMMENT: If snowmobiling is the primary purpose of the trip, then snowmobilers are missing the real point of a visit to the parks.
RESPONSE: No response.
COMMENT: I won't visit the parks if I can't ride a snowmobile.
RESPONSE: No response.
COMMENT: I will not return to the park unless snowmobiles are banned because they ruined my park experience.

RESPONSE: No response.
COMMENT: I enjoyed my snowcoach ride.
RESPONSE: No response.
COMMENT: During a visit to Yellowstone I saw bison being chased by snowmobiles. I saw wildlife being harassed. The mistreatment of wildlife negatively affected my park experience.
RESPONSE: Impacts on wildlife and visitor experience are disclosed in the FEIS and the SEIS.
COMMENT: General concern for protection of park values (human refuge, exquisite quiet - spirituality etc.). The sound, smell and visible snowmobile fumes impair my visitor experience. They interfere with my ability to smell clean air and to hear the sounds of the thermal areas, the geysers, wolves howling, birds singing, and the wind through the trees. These are the very reasons I visit wish to visit the parks. They were created to protect these values for my enjoyment.
RESPONSE: Impacts on visitor experience and related resources are disclosed in the FEIS and the SEIS.
COMMENT: I will not come to the park unless the snowmobile ban is enacted. The quiet nonmotorized experience I desire is not currently available to me in Yellowstone.
RESPONSE: No response.
COMMENT: Snowcoaches are unpleasant/not as enjoyable as snowmobiles (windows fogged, cramped etc). I don't want to ride in one.
RESPONSE: No response.
COMMENT: I will not visit the parks if I can't ride a snowmobile.
RESPONSE: No response.
COMMENT: Pollution and noise... those are the very things I go to national parks to escape from!
RESPONSE: Impacts on visitor experience and related resources are disclosed in the FEIS and the SEIS.

WILDLIFE	
COMMENT:	The harassment of wildlife in winter results causes them to burn more calories during a time when they are particularly stressed (hungry, not eating etc).
RESPONSE:	Impacts on wildlife are disclosed in the FEIS and the SEIS.
COMMENT:	The grooming of roads in the winter is causing significant adverse effects on bison populations. These effects will only worsen in the future.
RESPONSE:	Impacts on wildlife, including bison, are disclosed in the FEIS and the SEIS.
COMMENT:	Bison leave the park on groomed roads and are then shot by the livestock industry. Snowmobile use has been linked to increasing numbers of wild buffalo migrating out of YNP. Buffalo who wander out are subject to cruel harassment , capture and slaughter by Montana DOL.
RESPONSE:	Impacts on wildlife, including bison, are disclosed in the FEIS and the SEIS.
COMMENT:	Snowmobiles harm wildlife and wildlife habitat.
RESPONSE:	Impacts on wildlife are disclosed in the FEIS and the SEIS.
SUMMARY COMMENT:	I did not witness wildlife harassment on my trip to Yellowstone. The wildlife I saw in the parks did not appear to be disturbed in anyway by my snowmobile. From our observations the wildlife were accustomed to the snowmachine and car traffic even at the existing noise and pollution levels.
RESPONSE:	Impacts on wildlife are disclosed in the FEIS and the SEIS.
SUMMARY COMMENT:	Many persons commented that the NPS had exaggerated the level of adverse effect on wildlife. Many persons expressed that snowmobiles do not harm the environment or wildlife.
RESPONSE:	The effects of snowmobile use are clearly disclosed under each alternative presented in the FEIS and SEIS.
COMMENT:	The long-term economic viability of the area depends upon protecting Yellowstone.

RESPONSE: NPS agrees.
NEPA PROCESS
COMMENT: We believe that the DSEIS contains insufficient information for NPS to legally overturn the decision.
RESPONSE: The decision to be made, if different from the existing decision, must be accompanied by rationale.
COMMENT: Allowing for further public comment was not necessary - there was overwhelming public comment the first time around (over 45,000 letters were received on the DEIS). The NPS had sufficient public comment on the first document.
RESPONSE: No response.
PURPOSE AND NEED
SUMMARY COMMENT: There was broad public support for the phase out of snowmobiles. The DSEIS comment period is the fifth time the NPS has solicited public input on this issue. During every one of the previous comment periods the public has overwhelmingly stated that it wants snowmobiles removed from these parks.
RESPONSE: No response.
COMMENT: Your own policy states that when visitor uses conflict, the use that is causing the greater impact should be eliminated. NPS is in violation of laws (e.g., the Organic Act), regulations, and EOs (e.g., 11644) if it allows snowmobiling in the parks.

RESPONSE:

Adverse impacts on park resources and values are never welcome in a national park. However, the level of visitor conflict must be analyzed and efforts to mitigate the effects must be undertaken. As NPS policy states, because a park use may have an impact does not necessarily mean that it will impair park resources or values for the enjoyment of future generations. Impacts may affect park resources and values and still be within the discretionary authority conferred by the Organic Act. In situations where an adverse effect has been determined, NPS must ensure that any negative or adverse impacts are the minimum necessary, unavoidable, cannot be further mitigated and do not constitute impairment of park resources (see NPS Management Policies 2001, 8.1).

Executive Orders (EO) and other regulations provide further guidance for some uses in national parks. Snowmobiling is one such use. Under EO 11644 (as amended by EO 11989) and 36 CFR 2.18, 36 CFR Part 13, and 43 CFR Part 36, superintendents must close a designated off-road vehicle route whenever the use is causing unacceptable adverse effects on the soil, vegetation, wildlife, wildlife habitat, or cultural resources. The determination regarding what level of adverse effect is unacceptable is at the discretion of the decision maker and ultimately the courts.

SUMMARY COMMENT:

NPS should not expend additional money and time to prepare EISs, manage snowmobiles and restore damage caused by them. NPS should not waste any more money studying the issue. I object to the preparation of the supplemental EIS.

RESPONSE:

The NPS is preparing this SEIS to fulfill a settlement with the International Snowmobile Manufacturers Association (ISMA). The settlement signed on June 29, 2001 provides that the NPS prepare a Supplemental Environmental Impact Statement to consider additional information from ISMA as well as any new or relevant updated information that was not available at the time of the original decision.

COMMENT:

The snowmobile industry has produced no new evidence that cleaner and quieter machines can be produced.

RESPONSE:

New 4-stroke machines are currently available for purchase. Each alternative assessed in the SEIS requires that the best available technology be in snowmobiles entering the parks, whether or not the industry has produced an adequate number of those vehicles.

SUMMARY COMMENT:

Commenters expressed the opinion that considering commercial interests above the parks is not legal and does not comply with NPS policy. Some commenters stated a concern that their tax dollars were being used to support the snowmobile industry and not the parks. Others stated that local control of federally owned lands is not legal nor is it justified. Still others express concern that the NPS and the DOI are being unduly influenced by the snowmobile industry and other special interests.

<p>SUMMARY RESPONSE:</p> <p>Businesses in gateway communities provide valuable services to visitors to the parks. Parks have become an integral part of the larger regional environment. NPS policy directs the Service to "...work cooperatively with others to anticipate, avoid and resolve potential conflicts; protect park resources and values; provide for visitor enjoyment; and address mutual interests in the quality of life of community residents, including matters such as compatible economic development and resource and environmental protection"(NPS Management Policies 2001 (1.5)).</p>
<p>COMMENT:</p> <p>It is not necessary to allow snowmobiles in order to allow winter access for the disabled. The ADA was enacted to ensure that equal access is provided to persons with disabilities. If only snowcoaches are allowed in the parks then everyone has equal access via snowcoach.</p>
<p>RESPONSE:</p> <p>NPS agrees.</p>
<p>COMMENT:</p> <p>Snowmobiles are more destructive than other park activities. Snowshoeing and skiing are more compatible with the reasons that the park was created.</p>
<p>RESPONSE:</p> <p>In general, nonmotorized use has less impact on park resources and values than does motorized use. However, nonmotorized uses are not free of impacts, as disclosed in the FEIS.</p>
<p>COMMENT:</p> <p>Motorized use is not a right. The parks belong to all users, not just the snowmobilers.</p>
<p>RESPONSE:</p> <p>The NPS agrees. However, providing opportunities for appropriate public enjoyment is an important part of the Service's mission. Other park uses that are unrelated to public enjoyment – may sometimes be allowed as a right or privilege - if law or regulation does not otherwise prohibit them. In exercising its regulatory authority the Service will allow only uses that are 1) appropriate to the purpose for which the park was established and (2) can be sustained without causing unacceptable impacts to park resources and values. Recreational uses that would impair park resources cannot be allowed. The only exception is when an activity is specifically mandated by Congress" (NPS Management Policies 2001).</p>
<p>SUMMARY COMMENTS:</p> <p>Some commenters on the SEIS wrote "Yellowstone was created as a "public park or pleasuring-ground for the benefit and enjoyment of the people and that enjoyment is prevented by the ban". Many others felt that respect for individual preference for access should be allowed and that the freedom to enjoy the parks at their own pace was central to their park experience. The elimination of snowmobiles would violate the original intent of the national parks.</p>

SUMMARY RESPONSE:

Commenters are correct that Yellowstone’s enabling legislation (17 Stat.32), enacted in 1872, states that the park is set aside for the benefit of the people. The NPS points out, however, that section 2 of the legislation goes on to state that the Secretary of the Interior shall have control over the parks and shall “make and publish such rules and regulations as he may deem necessary or proper for the care and management of the same. Such regulations shall provide for the preservation, from injury or spoilation, of all timber, mineral deposits, natural curiosities, or wonders within said park, and their retention in their natural condition.” A careful reading of the legislation reveals that while the parks were created for the enjoyment of the people, their enjoyment shall not be undertaken at the expense the natural wonders in their natural condition. Further, it would be unconscionable to promote an activity that precludes others’ enjoyment of those same wonders in their natural condition. Under the original decision, winter access to the parks would be maintained at (historic use levels), and enjoyment of the natural wonders of the parks -by the public - would continue.

NPS policy provides further guidance to the parks on this issue: “Providing opportunities for appropriate public enjoyment is an important part of the Service’s mission. Other park uses that are unrelated to public enjoyment – may sometimes be allowed as a right or privilege if law or regulation does not otherwise prohibit them. In exercising its regulatory authority the Service will allow only uses that are 1) appropriate to the purpose for which the park was established and (2) can be sustained without causing unacceptable impacts to park resources and values. Recreational uses that would impair park resources cannot be allowed. The only exception is when an activity is specifically mandated by Congress” (NPS Management Policies 2001).

EXPRESSION OF OPINIONS AND GENERAL CONCERNS**SUMMARY COMMENTS:**

Please protect (maintain) the snowmobile experience for future generations (kids and grandkids).

Protect my right to access the park via a personal vehicle. I want to see the park at my own pace.

Please protect the park for future generations (children and grandchildren) by eliminating snowmobiles.

30 years ago Yellowstone was a place I went to escape the whine of vehicles and the smell of exhaust. Shouldn’t there be some place, some time, some season where we can go to experience nature and be re-created? We will be a sorry lot when it is all gone.

The original decision was based on sound science, public meetings, and public comment.

The air and noise pollution and the disruption of wildlife currently being caused by snowmobiles in Yellowstone violate the spirit if not the letter of the National Park Service charter.

I am very concerned that snowmobiles are degrading the natural qualities of parks.

SUMMARY RESPONSE:

Expressions of general concern, though not unimportant, are not substantive in relation to the analysis provided in an EIS. These concerns are, for the most part, addressed in many other comments and responses to them. In some instances, they reflect the purpose and need for action as described in Chapter I of the FEIS and SEIS.

SECTION 5: SUMMARIES OF REPRESENTATIVE LETTERS INCLUDING LETTERS FROM GOVERNMENT ENTITIES, AND RESPONSES TO THEM

Listed alphabetically within each category below are senders of non-form letters judged to be representative of the entire body of comment. The comments made in each letter are summarized due to the total volume of comments on the Draft SEIS. Summaries are intended to capture sufficient information for preparation of a suitable response. In accordance with 40 CFR 1503.4(b), letters determined to be substantive are to be duplicated in full, or summarized, and attached to the FSEIS. The representative letters, irrespective of any determination about “substantiveness,” contain the range of substance in the body of comment and are all duplicated in Appendix A to meet the NEPA requirement.

Substance is gauged by NEPA criteria (40 CFR 1503.3) as follows: comments should be as specific as possible, and address the merits of the alternatives or the adequacy of the statement, or both. Additional information that is within the scope of analysis is also regarded as substantive. Substantive comments can potentially be responded to by modifying alternatives, evaluating alternatives not previously considered, or supplementing/improving/modifying the analyses. Comments that are editorial in nature, provided along with other more substantive comments, will not be included in the summary or be responded to directly. Among these are comments alleging bias or “improper tone,” which in this case are a matter of perception not of substance. Other comments that are critical of analysis in the FEIS rather than that of the SEIS, whose scope of analysis is distinctly different, will not receive emphasis. Such comments tend to revisit issues with the view that the FEIS/ROD is faulty. NPS has never admitted fault and is proceeding with issues and analysis strictly in the confines of the settlement agreement to consider new information on snowmobile technology.

Due to the volume of comment in 112 letters summarized below, it is not reasonable or practical to address most proposed new wording, editorial remarks, or minor factual alterations at this time

Summarized Comment Letters

This listing is provided as a convenience to the reader, showing the order in which the following summarized letters and responses may be found. Listed alphabetically within each category below are senders of non-form letters that are summarized in this section. One hundred and fourteen letter writers are listed. Categories other than government, academia, and business are intended as a meaningful, but general, guide to groupings of letters that are similar in nature. They are identified as organizations or individuals that are either generally in favor of snowmobile use in the parks or as generally in favor of the existing decision to phase snowmobiles out. Organizations and individuals are separated in both cases, because organizations generally note that they speak for their memberships. It should be noted that in the NEPA context, there should be no special significance attached to any letter or any specific category of letters, or the order in which they are listed here.

Cooperating Agency Letters (6)

1. Cooperating Counties: Represented by Paul Kruse
2. Environmental Protection Agency, Region 8
3. State of Idaho, Office of the Governor
4. State of Montana, Office of the Governor
5. Park County, WY, Board of Commissioners
6. State of Wyoming, Department of State Parks and Cultural Resources (with attachments by DEQ and Game and Fish)

Government-Related or Agency Letters Other than Cooperating Agencies (13)

7. Blaine County Commissioners, Idaho
8. Confederated Salish and Kootenai Tribes
9. Honorable Rush Holt, Member of U.S. House of Representatives
10. The Shoshone-Bannock Tribes
11. Honorable Craig Thomas, Member of U.S. Senate
12. Representative Harry B. Tipton, Wyoming State Legislature
13. USDA Natural Resource Conservation Service
14. U.S. House of Representatives, Committee on Small Business
15. U.S. Small Business Administration, Office of Advocacy
16. Valley County, Idaho: Clerk of the District Court
17. The City of Wall, South Dakota
18. The Town of West Yellowstone, Montana
19. Wyoming County Commissioners Association

Academia (7)

20. Central Michigan University, Department of Geography
21. Dr. Gary Bishop, University of Denver, Department of Chemistry and Biochemistry
22. Robert Keiter, Professor of Law, University of Utah
23. Dr. Mary Meagher, Animal Ecologist Gardiner MT
24. Alvin J. Nelson, Jr., M.S., University of Idaho
25. Ethan Schoolman, Politics Department of Princeton University
26. David Wilcove, et al: Letter from 18 Ph.D. signatories

Organizations Generally Favoring Use of Snowmobiles in the Parks (16)

27. American Council of Snowmobile Associations
28. Big Horn Mountain Country Coalition
29. Blue Ribbon Coalition, Inc.
30. California-Nevada Snowmobile Association and 31. Utah Snowmobile Association

32. Citizens for a User Friendly Forest – “Red Meat, Board Feet, Dig Deep, Drive Jeep”
33. Cody Chamber of Commerce
34. Illinois Association of Snowmobile Clubs, Inc.
35. Minnesota United Snowmobile Association
36. Montana Tourism Coalition
37. Moore, Smith, Buxton and Turcke (Representing BlueRibbon Coalition, Inc., and the Montana and Idaho Snowmobile Associations)
38. National Alliance of Gateway Communities
39. Washington State Snowmobile Association
40. Western Environmental Trade Association
41. Wyoming State Snowmobile Association
42. Yellowstone Chamber of Commerce, et al.

Organizations that Generally Support the Existing Decision (26)

43. Alliance for the Wild Rockies
44. American Lands Alliance, Colorado Environmental Coalition, Colorado Mountain Club, Colorado Public Interest Research Group, High Country Citizens Alliance, Quiet Use Coalition, Rocky Mountain Recreation Initiative, San Juan Citizens Alliance, SINAPU, Southern Rockies Ecosystem Project, The Wilderness Society, Upper Arkansas and South Platte Project, Western Colorado Congress, White River Conservation Project
45. Bluewater Network
46. Fly Rod & Reel: The Magazine of American Fly-Fishing
47. Friends of Animals
48. Greater Yellowstone Coalition, Natural Resources Defense Council, The Wilderness Society, Natural Trails and Waters Coalition, National Parks Conservation Association, Defenders of Wildlife, Sierra Club, Jackson Hole Conservation Alliance, and Wyoming Outdoor Council
49. Isaac Walton League of America, Inc., Colorado Division
50. Jackson Hole Conservation Alliance
51. Kettle Range Conservation Group
52. Last Chance Audubon Society, Helena MT
53. Noise Pollution Clearing House, Pitts
54. Park County Environmental Council
55. Physicians for Social Responsibility
56. Predator Conservation Alliance
57. Public Employees for Environmental Responsibility (PEER)
58. Rock The Earth, Pittsburgh PA
59. Schubert and Associates (Representing The Fund for Animals, The Humane Society of the United States, Biodiversity Legal Foundation, and Ecology Center)
60. Sierra Club, Bozeman MT
61. Sierra Club, Loma Prieta Chapter, Guadalupe Regional Group
62. Sierra Club, Eastern Idaho Group
63. The University Physicians Toxic Exposure Clinic, University of Arizona

64. The Wilderness Society - Northern Rockies Regional Office, Bozeman MT
65. Wildlands Center for Preventing Roads
66. Wild Things Unlimited, Bozeman MT
67. Women's Voices for the Earth
68. Wyoming Outdoor Council

Individuals Generally Favoring Use of Snowmobiles in the Parks (10)

69. Gary Baxter, West Yellowstone MT
70. Robert L. Berger, Lynnwood, WA
71. Sean Blacklocke, Independent Environmental Consultant, Washington, DC
72. Matthew Burkhardt, Laramie WY
73. Kim and Joyce Childs, Idaho Falls ID
74. Jerry Dickenson and Carol Iverson Dickenson, Rock Springs WY
75. Edgerton and Johnson, West Yellowstone MT
76. Jeff Guengerich, Gardiner MT
77. M.B. Johnson, Ft. Wayne IN
78. Frank Odasz, Casper WY

Individuals that Generally Support the Existing Decision (18)

79. Don Bachman, Bozeman MT
80. Michael Barenti, Spokane WA
81. Betsy Buffington, Bozeman MT
82. Jim Chapman, gte.net
83. Jeffrey Erdoes, Carson City NV
84. Steven Krichbaum, Staunton VA
85. S. Helen Labun, Princeton NJ
86. Michael Lee, St. Cloud MN
87. Name Withheld by Request
88. Janna S. Rankin, Alta WY
89. Allen Reel, Esq, Beaverton OR
90. Bob Seibert, Yellowstone National Park, West District Ranger
91. Ruth Solomon, Princeton NJ
92. Mary Taber, Yellowstone National Park
93. Arthur Unger, Bakersfield CA
94. Michael Yochim, Madison WI
95. Tim Young, Jackson WY
96. Dr. Roger Zimmerman, Ph.D., Portland ME

Letters from Business Owners or Representatives of Businesses (16)

97. Bill Bennett and 117 business owners/residents of West Yellowstone, MT
98. Birch, Horton, Bittner and Cherot (Representing International Snowmobile Manufacturers Association)
99. Birch, Horton, Bittner and Cherot (Representing International Leisure Hosts, Ltd.)
100. Grand Teton Lodge Company
101. Glen Loomis, West Yellowstone
102. Mattracks® Worldwide Track Technology
103. David McCray
104. Old Faithful Snowmobile Tours
105. Pahaska Teepee Resort
106. Randy Roberson, Yellowstone Vacations
107. Clyde Seely, West Yellowstone
108. West Gate Operators
109. West Yellowstone Snowmobile Rental Operators
110. Yellowstone Arctic ♦ Yamaha
111. Yellowstone Alpen Guides
112. Yellowstone Safari Company

Cooperating Agency Letters (6 Letters)

LETTER 1. COOPERATING COUNTIES: REPRESENTED BY PAUL KRUSE	
COMMENT:	The Counties strongly support Alternative 2 as the best vehicle to resolve the issues that confront the parks by using management tools instead of simply banning a popular recreational use. The alternative offers interim and long-term strategies that include essential research coupled with adaptive management techniques.
RESPONSE:	This represents an expression of an opinion as to what the decision should be based on the counties' rationale. All alternatives offer interim and long-term strategies that include research.
COMMENT:	The Counties feel strongly that the current ban on snowmobiles and snowplanes is unjustified and unwise based on the information in the FEIS/ROD. The ban fails to meet the test required by the Organic Act and violates the fundamental mandate for enjoyment of park resources and values by people of the United States. Parks are to be open, inviting and accessible to every segment of American Society.
RESPONSE:	Justification for the decision is amply represented in the existing ROD. This comment is beyond the scope of the SEIS, which is intended only to solicit further public comment and to analyze the ability of new snowmobile technology to address the issues.
COMMENT:	Air Quality: NPS cites air quality as a major issue, but has failed to cite a single instance where there have been violations of either the regulations or the law under the Clean Air Act. There have not been any recorded violations of even the most sensitive Clean Air Class I standards. NPS is at fault if there are employee health issues; NPS has not acted on the information until this past year, and has not requested that either the State of Montana or the State of Wyoming conduct necessary testing.
RESPONSE:	Air quality has been and remains a key issue relative to motorized winter recreation use. Violation of NAAQS standards is only part of the issue, since air quality in these parks must meet a standard of non-degradation for Class I airsheds.
COMMENT:	Reliance on Minimum Standards: It is disappointing that NPS has chosen to utilize the minimum standard for key components of the document in spite of the scrutiny, litigation and unprecedented public participation in the NEPA process. Example: NPS survey of employees.
RESPONSE:	NPS intent is to meet the letter and spirit of the law.

LETTER 1. COOPERATING COUNTIES: REPRESENTED BY PAUL KRUSE
<p>COMMENT:</p> <p>Creating Duplicate Jurisdictions: We are extremely concerned by NPS’ efforts to create a new third level of environmental jurisdiction for the parks. The State of Wyoming already has primacy through its DEQ and the US EPA has oversight responsibility. The proposed new level of authority will only add to the bureaucracy and create unnecessary redundancy.</p>
<p>RESPONSE:</p> <p>NPS stands behind the discussion of jurisdiction that was published in the DSEIS. See 3, above. The State of Wyoming has expressed no concerns about air quality in the parks, where air quality is clearly at issue. NPS has jurisdictional authority and responsibility for air as a park resource.</p>
<p>COMMENT:</p> <p>Mandating the Use of Unavailable Vehicles and Untested Technology: There is inadequate data in the EIS to support the alleged benefits of snowcoaches over 2-stroke snowmobiles. NPS uses hypothetical models. Data on 4-stroke engines, including the SWRI study, further erode the perceived benefits of snowcoaches. SWRI found that snowcoach emissions are up to six times higher than those from the new clean-quiet snowmobile. New snowcoach technology will take years before they can be manufactured and made available for use in the parks.</p>
<p>RESPONSE:</p> <p>In cases where data is incomplete or unavailable, and there is not sufficient time or funding for data collection, NEPA allows the use of theoretical approaches that are accepted within the scientific community. Based on existing data, as applied in accepted models for analysis, it remains clear that snowcoach access only contributes less pollution than access via snowmobile in either SEIS alternative. See letter from Mattracks. A comprehensive evaluation of options available for assuming emission factor inputs has been accomplished. The results are to be reflected in air quality modeling for both snowcoaches and snowmobiles.</p>
<p>COMMENT:</p> <p>Change Visitation Levels: It is a major concern that the SEIS utilizes a new method of calculating visitation levels. The result is to raise the “estimated” baseline number of visitors, which dramatically skews the analysis by diluting the economic effects the proposed bans will have. Example: YNP North and West entrances have a 25% re-entry rate, and East and South have a 0% re-entry rate.</p>
<p>RESPONSE:</p> <p>Re-entry rate has always been somewhat of a technical issue. The SEIS scenarios were worked out with Kim Raap of Wyoming, in view of past issues. The scenarios provide, for modeling purposes, how snowmobilers might use the park entrances and travel corridors in different alternatives. Visitation levels remain unaffected considering a mix of snowmobiles and snowcoaches. NPS believes these revised numbers will increase the economic impacts of Alternatives 1a and 1b.</p>
<p>COMMENT:</p> <p>Enforcement: The SEIS uses violations of existing regulations to justify the ban, while not prosecuting those violations.</p>

LETTER 1. COOPERATING COUNTIES: REPRESENTED BY PAUL KRUSE
<p>RESPONSE:</p> <p>NPS issues warnings and violation notices to those who are apprehended. This is a small part of the rationale for the existing decision.</p>
<p>COMMENT:</p> <p>Many of our earlier concerns regarding the impediments to our full and effective participation in the EIS process (and the treatment of information we did submit) still exist. Our previous comments should be reviewed and addressed. NPS has virtually ignored the analysis that has been presented on these (profound social and economic impacts of Alternatives 1, 1a and 3 [sic]) and other key issues.</p>
<p>RESPONSE:</p> <p>NPS has reviewed and considered all input, including comments, provided by Cooperating Agencies throughout this process. All input has been acknowledged or reproduced in published environmental documents, and used where applicable.</p>
<p>COMMENT:</p> <p>Twelve pages of section-by-section, sentence-by-sentence comments, questions and information requests follow Mr. Kruse's cover letter. For the most part, the comments are related to the issues summarized above. Major issues are reflected in the following comments:</p>
<p>RESPONSE:</p> <p>Comments that apply to information in the final document will be further considered. The specific comments have been reviewed and considered.</p>
<p>COMMENT:</p> <p>The Counties once again were not given inadequate time in which to participate effectively as evidenced by the lack of time to evaluate and decide on the terms of the Cooperating Agency MOU. Why did NPS voluntarily agree to a settlement that placed such severe restrictions on the Counties' participation?</p>
<p>RESPONSE:</p> <p>Terms of the MOU were very similar to those that Cooperating Agencies agreed to for the earlier FEIS process. Time frames in the settlement agreement were, for the most part, dictated by the plaintiffs in the 2000 lawsuit and predicated on having a new decision prior to the 2002-03 winter season.</p>
<p>COMMENT:</p> <p>It is incomprehensible that NPS chose to ban snowmobiles given the dearth of information on key issues versus the strong public support for their continued use. Public opinion polls indicate even stronger support for snowmobiles and at the same time those indicate very little support for the option NPS chose in the FEIS/ROD.</p>
<p>RESPONSE:</p> <p>NPS is unaware of the source for statements about public opinions and polls in this comment. The record for this project indicates that the majority favors a ban on snowmobiles in the parks. Also, the ROD is very clear about the information used in making the decision to ban snowmobiles.</p>

LETTER 1. COOPERATING COUNTIES: REPRESENTED BY PAUL KRUSE	
COMMENT:	How is NPS more qualified to determine whether impacts of snowmobiles violate laws than a federal magistrate?
RESPONSE:	No response necessary.
COMMENT:	It is the responsibility of NPS to vigorously and systematically enforce the regulations. Based on the statistics in the document (DSEIS) it appears this is not being done. If regulations are inadequate, it is the responsibility of NPS to rewrite them.
RESPONSE:	See previous comment and response to comment 8.
COMMENT:	NPS proposes to ban snowmobiles only, when literature indicates that skiers and snowshoers cause more stress on wildlife.
RESPONSE:	This comment is beyond the scope of SEIS analysis. The November 2000 ROD places restrictions, including closures, on nonmotorized use based on such impacts.
COMMENT:	Recently it was discovered that USFWS officials willingly “planted” false evidence on lynx. Given this fraud was discovered between the time the DEIS was issued and the DSEIS was initiated, did the NPS communicate with USFWS to insure the information contained in the DSEIS was not tainted in any way? The reliability of the use of any information submitted by USFWS is further eroded by National Academies of Sciences.
RESPONSE:	This comment is clearly outside the scope of analysis for the SEIS. Lynx are not an issue for either NPS or FWS in regard to winter use as long as no new groomed routes or trails are created. Allegations about FWS are inappropriate as a comment on the winter use SEIS.
COMMENT:	It is well documented that large ungulates cause severe damage to wetlands. There is no analysis regarding the effects that these large animals have on the water quality, the thermal features and the vegetation around these sensitive areas.
RESPONSE:	NPS is unsure what end such an analysis would serve. Is it intended that such an impact be mitigated by removing or regulating the wildlife? Or that snowmobiles should be allowed to access such areas because they are already impacted?

LETTER 1. COOPERATING COUNTIES: REPRESENTED BY PAUL KRUSE
<p>COMMENT:</p> <p>The decision in the FEIS/ROD will arbitrarily exclude people from the parks and create a system of “haves and have nots” based on physical and economic ability – something that can be corrected in the new process. Snowmobiles allow freedom for people with physical limitations.</p>
<p>RESPONSE:</p> <p>Comments on the FEIS/ROD are outside the scope of analysis for the SEIS. NPS notes that the decision was not arbitrary; despite allegations by the plaintiffs. The November 2000 ROD did not restrict access to the parks.</p>
<p>COMMENT:</p> <p>The document’s treatment of snowplanes is, at best, confusing. The first time the Counties became aware that NPS would not consider the issue was in the NPS’ responses to the comments that individual counties and states submitted on the internal working draft. NPS gave various Congressional staff members the impression that snowplanes would be considered as part of the DSEIS.</p>
<p>RESPONSE:</p> <p>NPS has been clear from the beginning that the scope of analysis for the SEIS is limited to consideration of new snowmobile technology. NPS has no need to revisit all the issues addressed in the FEIS, including snowplanes.</p>
<p>COMMENT:</p> <p>Other towns and cities should be viewed as gateway communities besides Jackson, Cody, Gardiner, and West Yellowstone.</p>
<p>RESPONSE:</p> <p>These gateways have specifically been defined since the initial DEIS, with no objection. NPS is unconvinced that other gateways should be defined, especially in the light that impacts on all adjacent lands/jurisdictions have been disclosed in the FEIS.</p>
<p>COMMENT:</p> <p>NPS is unable to establish that snowmobiles cause harm to wildlife, yet that remains one of the key issues.</p>
<p>RESPONSE:</p> <p>NPS has established that wildlife is harassed or otherwise disturbed by snowmobile use during a time of year when stress may prove the difference between mortality and survival.</p>
<p>COMMENT:</p> <p>Based on actual data, rather than modeling, snowcoaches are louder than 4-stroke snowmobiles. Forcing visitors to use snowcoaches would actually increase vehicle noise in the parks.</p>

LETTER 1. COOPERATING COUNTIES: REPRESENTED BY PAUL KRUSE
<p>RESPONSE:</p> <p>As the FEIS and DSEIS explain, loudness is not the only aspect of vehicle sound to be considered. The audibility and type of sound is also very important. Beyond that, by using snowcoach access only, far fewer vehicles would be traveling in the parks – hence much less noise.</p>
<p>COMMENT:</p> <p>Banning snowmobiles from the parks eliminates a key alternative that is available to visitors with disabilities.</p>
<p>RESPONSE:</p> <p>It is evident that, considering the disabled population in general and considering very elderly or very young visitors, snowcoaches offer the best opportunity for winter access. A new generation snowcoach would incorporate state of the art design features for this population.</p>

LETTER 2. ENVIRONMENTAL PROTECTION AGENCY, REGION 8
<p>COMMENT:</p> <p>Given the SEIS analysis, EPA is satisfied that if applicable regulation, law and policy are followed Park resources can be protected while maintaining motorized winter access. EPA finds that NPS again used the best-available information, scientific analyses, expert agency comment, and public input in assembling both the DSEIS and FEIS. The assessment of impacts in these documents is supported by an extremely thorough and credible body of human health, environmental, and wildlife science, much of which is specific to the Yellowstone ecosystem. NPS, academic and agency researchers have actively studied the impacts of snowmobile use for over 10 years in these parks. The Yellowstone ecosystem has the benefit of more peer-reviewed scientific research on the effects of motorized winter recreation than any other place on earth.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>EPA’s primary concern with the SEIS is that three of the four DSEIS alternatives (1b, 2 and 3) threaten to exceed National or Montana Ambient Air Quality Standards for carbon monoxide in the first year of implementation. NPS has the ability, information and authority to set interim limits to vehicle numbers that would assure compliance with standards. EPA encourages interim vehicle limits be sufficiently reduced in the FSEIS to assure compliance. Although complying with Air Quality Standards does not assure elimination of impairment to visibility or human health caused by vehicle exhaust, it is an achievable first step.</p>
<p>RESPONSE:</p> <p>Modeled results are revised for the FSEIS. Although further analysis and repeated model runs could determine a level at which compliance would be assured, there is insufficient time in which to do so. The decision maker can choose to affirm the existing decision, or to initially set snowmobile use at a lower level in deference to this concern.</p>

LETTER 2. ENVIRONMENTAL PROTECTION AGENCY, REGION 8

COMMENT:

EPA recently learned that some actions required by the ROD to reduce impacts to air quality this past winter were not implemented. EPA is concerned that air quality, human health and visibility continue to be impaired, and suggests that interim limits be adjusted in each SEIS alternative to assure compliance with air quality standards in the coming season.

RESPONSE:

See previous comment and response.

COMMENT:

Environmentally Preferred Alternative: The analysis in the DSEIS shows that Alternative G (FEIS and ROD) provide the best available protection to human health, wildlife, air quality, water quality, soundscapes, visitor experiences, and visibility while maintaining motorized and nonmotorized winter access. EPA finds no objection to DSEIS Alternative 1a (No action, or G).

RESPONSE:

No response necessary.

COMMENT:

EPA Rating: Based on the disclosures in the DSEIS, alternatives 1b, 2 and 3 could negatively impact human health. Alternatives 2 and 3 are likely to be inconsistent with NPS environmental policy regarding protection of air quality and related values. Possible violation of environmental regulations can and should be avoided by applying further substantial corrective measures, or consideration of additional alternatives. Because the decision maker can select from among alternatives in the FEIS, EPA notes that FEIS alternatives A, B, C, D, E and F would, without further modification, likely not comply with environmental regulation, policy, or executive orders.

RESPONSE:

Alternative G, or the existing decision, best meets the need for resource and value protection relative to NPS mandates and policies. A combination of closures, reduced snowmobile use, mass-transit, new technology, and adaptive management would conceivably meet the needs as well. Such choices are offered through the range of alternatives, though only one single alternative, taken as a whole, meets them outright.

COMMENT:

EPA attaches 10 pages of detailed and specific comments. For the most part, the comments are related to the issues summarized above. Key points are as follows.

RESPONSE:

The specific comments have been reviewed and considered. Those that apply to information in the final document will be further considered.

LETTER 2. ENVIRONMENTAL PROTECTION AGENCY, REGION 8
<p>COMMENT:</p> <p>Alternative 2 would require NPS to enforce an emissions standard more stringent than current or proposed standards. NPS' authority does not extend to such a degree, therefore, the alternative appears infeasible. Without NPS authority, the vehicle cap is the only means in the alternative to change air quality performance resulting in far less improvement in air quality than that estimated in the DSEIS.</p>
<p>RESPONSE:</p> <p>Alternative 2 represents the proposal offered by the State of Wyoming, with support from other Cooperating Agencies. Provisions of alternative 3, such as use of guided tours only, appear to be the only viable means by which NPS can legally enforce the use of cleaner and quieter machines; i.e., through permit terms.</p>
<p>COMMENT:</p> <p>Alternative 3 uses but does not adequately define the term "best available technology" for reducing emissions and noise. Using the current definition, BAT may be interpreted as the best available production machine on the market each year, which accurately defines performance at the time of the DSEIS. However, there is no guarantee that the BAT will be any cleaner or quieter five years from now. The modeling results likely overestimate improvements in air quality over time, unless a better working definition of BAT is applied in the FSEIS.</p>
<p>RESPONSE:</p> <p>NPS recognizes these limitations and shares the concern. BAT will be re-defined in the FSEIS.</p>
<p>COMMENT:</p> <p>EPA encourages NPS to complete a screening-level, 24-hour average prevention of significant deterioration (PSD) Class I increment analysis for particulate matter. This analysis is necessary to fully understand impacts of current winter use, or alternative use, relative to Class I provisions of the Clean Air Act.</p>
<p>RESPONSE:</p> <p>NPS concurs that a PSD increment analysis for PM₁₀ is necessary. The results of an air quality modeling analysis, including an evaluation of PSD increment consumption for PM₁₀ are presented in the FSEIS.</p>
<p>COMMENT:</p> <p>EPA encourages the inclusion of visibility modeling, noting that its lack does not assure that compliance with National and State Ambient Air Quality Standards will be protected from further impairment. Frequent impairment of visibility and significant human health impacts are well documented.</p>
<p>RESPONSE:</p> <p>A visibility analysis is included in the FSEIS.</p>
<p>COMMENT:</p> <p>It is important to note in the FSEIS that 4-stroke technology by itself does not guarantee low emissions or quiet operation.</p>

LETTER 2. ENVIRONMENTAL PROTECTION AGENCY, REGION 8	
RESPONSE:	It will be so noted.
COMMENT:	The FSEIS should analyze “best available technology” for snowcoaches, for the purpose of comparability with BAT snowmobiles, and to clarify differing results between alternatives. EPA’s review of the SWRI report indicates snowcoach emissions are likely within the range of the estimated emissions used by NPS in the DSEIS. EPA concludes that snowcoaches are now and will likely continue to be the most protective form of visitor transportation for air quality and related values.
RESPONSE:	NPS shares the concern about comparability. Models have been run using the best available data within the allowable time constraints for the process. NPS’ intent regarding snowcoaches is to foster improvement in performance, impact mitigation, customer serviceability, and affordability. This intent is documented in the existing decision, and it applies to the snowcoach fleet regardless of the alternative selected.
COMMENT:	The DSEIS demonstrates convincingly that snowcoaches are the least impacting form of visitor transportation in frequency, magnitude and duration of noise impacts.
RESPONSE:	No response necessary.
COMMENT:	EPA notes a potential conflict with all snowmobile alternatives and federal regulation. NPS should explain how alternatives comply with 36 CFR 2.18(c), which states that snowmobiles are allowed in parks only when their use is consistent with the park’s natural, cultural, scenic and aesthetic values, safety considerations, management objectives, and will not disturb wildlife or damage park resources.
RESPONSE:	With reference to the existing FEIS and decision, this finding has already been made. If the new decision allows snowmobiles, NPS will need to make a similar finding, based on new technology and other mitigation evaluated in the FSEIS, about how the use is consistent with park resources and values.
COMMENT:	It does not appear that the DSEIS considered the economic benefits of increased visitation by cross-country skiers and snowshoers that is likely to occur if snowmobiling is curtailed or eliminated in the parks. The EIS does not address how the values of park experiences change in response to snowmobile closures, with other visitors enjoying the experiences.
RESPONSE:	NPS acknowledges the lack of economic analysis associated with replacement use. NPS has indicated that such replacement use is most likely to occur, and that this is fundamental to NPS’ assertion that snowcoach-only access is a viable course of action.

LETTER 2. ENVIRONMENTAL PROTECTION AGENCY, REGION 8	
SUPPLEMENTAL LETTER: COMMENTS TO BE CONSIDERED IN ADDITION TO PREVIOUS LETTER OF APRIL 23	
COMMENT:	EPA concludes that snowcoaches would provide the best available protection to park resources, but does not instruct NPS to ban snowmobiles from the parks because NPS has the sole authority for making the winter use decision and for implementing it.
RESPONSE:	No response necessary.
COMMENT:	DSEIS Alternative 2 envisions limiting park access to snowmobiles that emit 50% lower emissions beginning 2005-6. Such low emissions would not be required under EPA's currently proposed regulations for snowmobiles until 2010. Implementing Alternative 2 would require a change in NPS authorities to allow a snowmobile emission limit lower than EPA's emission limit and prior to the implementation of the EPA final rule.
RESPONSE:	NPS agrees.
COMMENT:	Additional information: Emissions control technology for snowmobiles continues to evolve. Today, there is a broad range of technologies available to reduce emissions, including some models of 4-stroke engines, use of electronic fuel injection with 4-strokes, use of semi-direct and direct fuel injection for 2-stroke engines, and the use of catalytic converters. Potential emission reduction benefits from these and future technologies depends on the engine calibration and amount of horsepower generated.
RESPONSE:	BAT should account for the possibility of new or unforeseen approaches that improve the spectrum of impacts associated with current technology. We should not place limitations on possible improvements, such as limiting BAT to 4-stroke machines
COMMENT:	EPA suggests the most protective way to define current "BAT" is to describe it based on emissions performance of a basic technology approach and not on engine design or operating characteristics alone (i.e., 4-stroke engines). If NPS uses an emissions-limited BAT definition, the FSEIS must indicate the authority by which NPS would implement an emission limit more stringent than proposed EPA limits.
RESPONSE:	NPS will take the suggestion into consideration.
COMMENT:	Though there is potential for industry to produce machines with greatly decreased emissions, the greatest challenge for implementing the technology is added unit cost, added chassis re-engineering, added weight, lack of market or regulatory incentive, and lead time needed. The earliest possible availability for further improved snowmobiles would be the 2007 model year.

LETTER 2. ENVIRONMENTAL PROTECTION AGENCY, REGION 8

RESPONSE:

No response necessary.

LETTER 3. STATE OF IDAHO, OFFICE OF THE GOVERNOR

COMMENT:

The planning effort has been hampered by lawsuits, unrealistic planning deadlines and the development of alternatives that are based more on politics than innovative recreation planning and management. The SEIS was necessary because NPS failed to provide the public with adequate time to comment on the original selected Alternative 1a. This alternative was not provided in the Draft EIS.

RESPONSE:

Alternative G was presented in the draft EIS. Because of public comments, and some internal concerns, mitigation in Alternative G was modified slightly between the draft and the final to allow additional time for gateway communities to adapt to the change, and to provide other implementation features to assist communities.

COMMENT:

There is clear distinction between the alternatives in the SEIS on personal freedom and recreation opportunities. The Draft SEIS fails to point out that millions of acres of backcountry nonmotorized recreation experiences are available in the park units for those who desire solitude and natural soundscape, under all of the alternatives.

RESPONSE:

It has been made clear throughout this process that, though many acres may be available for nonmotorized recreation, they are not accessible to most people. As is demonstrated in the SEIS, the impacts of snowmobiles, especially noise, go far beyond the immediate area of the travel corridors.

COMMENT:

It is clear that NPS' preferred alternative is 1a. Both alternatives 2 and 3 were placed in a negative light. Either one would provide significant improvements to visitor enjoyment and the natural environment over the existing situation.

RESPONSE:

NPS did not express a preferred alternative. It should be clear that the existing decision is alternative 1a. Both alternative 2 and 3 would significantly degrade the experience of those who prefer nonmotorized activities, or who wish to get away from the impacts associated with them.

COMMENT:

The Draft SEIS is biased toward alternative 1a in the soundscape analysis and in the information given on the emission standards.

LETTER 3. STATE OF IDAHO, OFFICE OF THE GOVERNOR
<p>RESPONSE:</p> <p>NPS believes the DSEIS is not biased. The SEIS discloses the impacts of all alternatives. Less impact is associated with alternative 1a.</p>
<p>COMMENT:</p> <p>Reduced winter visitation will have negative long-term effects. It is difficult to address the impacts of a given action, let alone the impacts to gateway communities, the region, or states involved. The difficulty is further compounded by the NPS' statement that "the impact of a price increase is unknown." NPS admits that they do not know the impacts and effects of the change. The analysis used to support the choices of alternatives 1a and 1b in the DSEIS is based on survey data collected prior to the supplemental draft. The data does not reflect the changes to the alternatives. How can this data be used to estimate the impacts to choices that did not exist at the time? As such, it is not a reliable tool to determine how an individual's behavior may change.</p>
<p>RESPONSE:</p> <p>It may be argued that the survey data did not fully probe all questions or potential solutions to winter recreation impacts. It may also be argued that because the survey was limited to current winter visitors, it was biased toward snowmobile use – therefore any use of the survey would similarly be biased. The fact is that there is little in the way of new information or alternative actions in the SEIS, compared to the FEIS.</p>
<p>COMMENT:</p> <p>From the outset, NPS has been unwilling to discuss carrying capacity levels in the parks. They have been unwilling to discuss adaptive management strategies. Rather, focus has been placed on removing snowmobiles from the parks and this continues in the DSEIS with alternatives 1a or 1b.</p>
<p>RESPONSE:</p> <p>A full range of alternatives has been considered. NPS has not been unwilling to discuss carrying capacities. It has been stated on numerous occasions that the process for determining carrying capacity is lengthy and contentious. It was not feasible to perform such an analysis in conjunction with the FEIS, in the allotted time. Adaptive management was originally proposed by the Park Service in Alternatives B and E of the earlier draft EIS and is part of alternatives 2 and 3 of the DSEIS. <u>After</u> considering all alternatives, NPS decided to remove snowmobiles.</p>
<p>COMMENT:</p> <p>Impacts to gateway communities cannot be so easily dismissed as in the SEIS. Who decides if an effect is minor or negligible? All gateway communities will be affected.</p>
<p>RESPONSE:</p> <p>Impacts on a state, regional or county level are very small relative to the total economy at that level. Impacts on gateway communities have not been dismissed. Apart from West Yellowstone, they are very small to nonexistent. NPS acknowledges that some seasonal jobs may be lost or might shift to other sectors but this cannot be considered a significant impact in the context of the total economy. Additional explanation of community impacts will be included in the FSEIS.</p>

LETTER 3. STATE OF IDAHO, OFFICE OF THE GOVERNOR

COMMENT:

Alternatives 2 and 3 could be modified to have similar effects on wildlife as 1a or 1b by imposing a permit system. A permit system will give NPS the ability to control the times that snowmobiles enter the parks, and help facilitate travel operations in a more scheduled and controlled way.

RESPONSE:

Alternative 3 provides for a system using NPS permitted guides. Rationale provided in this comment is in large part the rationale for that feature in alternative 3. Most Cooperating Agencies are opposed to this feature.

COMMENT:

NPS' assumption about visitation is flawed. 1a and 1b will reduce the amount of visitation to the parks. NPS assumes that rental operations will switch to snowcoaches or Mattrack[®] conversions. The average cost of a clean snowmobile is \$7,400 while a Mattrack[®] conversion can run to more than \$50,000. While snowmobiles can be traded off at the end of a season, it is more difficult to replace a full-size vehicle.

RESPONSE:

The intent in the existing decision phasing into snowcoach only is to utilize the existing snowcoach fleet, phasing out older (noisier and more polluting) machines and replacing them over time with a new generation snowcoach. In the existing decision, NPS indicated it would support community marketing efforts, and assist with funding in the development and procurement of new snowcoaches.

COMMENT:

The State of Idaho supports the adoption of Alternative 2 as the plan for winter management in the three park units. We are disappointed that NPS did not incorporate more of the information that the Cooperating Agencies provided for the analysis. We are left with the distinct impression that the NPS would rather implement the original FEIS alternative rather than undergo this process. There appears to be a continued effort by park planning staff to remove snowmobile transportation from the parks.

RESPONSE:

The content of all documents is customarily reviewed and approved by NPS and other department officials. Unsupported allegations and perceptions are not germane to the issues at hand.

COMMENT:

Additional specific comments are contained in this letter.

RESPONSE:

These have been reviewed and considered. Comments that apply to material present in the final document will be further assessed.

LETTER 4. STATE OF MONTANA, OFFICE OF THE GOVERNOR
<p>COMMENT:</p> <p>One of the major themes that run throughout the document is “visitor experience” and the suggestion that snowmobiles negatively affect other user-groups experience. However little to no mention is made of the visitor experience impacts associated with eliminating one user group in favor of another user group. While a prohibition of snowmobile access will eliminate conflicts for the population who desire no snowmobile access, it will not eliminate the conflict for those without the means, ability or desire to access Yellowstone via nonmotorized access or snowcoach-only access. Is it a wise policy to judge which user group is more deserving or more appreciative of the values associated with our National Park system?</p>
<p>RESPONSE:</p> <p>The analysis of impacts on visitor experience does, in fact, disclose the effects of each alternative on snowmobile users. The discussion is done to the same degree as disclosure of impacts on nonmotorized users. The issue boils down to individual preference for a certain mode of access, and how the various modes of access affect the park or other visitors. The issue is not one of access per se. Clearly, it is the responsibility of the decision maker, based on evaluation of different alternatives, to weigh the effects and choices in light of law and policy, and then make a decision.</p>
<p>COMMENT:</p> <p>Allowing snowcoach access as an alternative to nonmotorized access provides an opportunity for those without the means, ability or desire to access the Park through nonmotorized means, however, visitor adaptation to this alternative continues to be questionable. Providing a snowcoach alternative to replace individual snowmobile access does little to address the concerns of “visitor experience” or “user conflict.”</p>
<p>RESPONSE:</p> <p>This comment relates to the decision to be made. See previous response.</p>
<p>COMMENT:</p> <p>It is questionable that air quality would be substantially improved with a complete conversion to snowcoach only access. If historic numbers of visitors are to be maintained, which has been publicly stated by NPS on numerous occasions, then the related increase in snowcoach numbers will be substantial. If snowcoaches were operating in a clean and quiet technology mode similar to snowmobiles, significant improvements to air quality could be recognized. However, technology for clean, fuel efficient, quiet snowcoaches does not presently exist.</p>
<p>RESPONSE:</p> <p>The greatest single factor in producing pollution during the winter is the number of vehicles. There is debate about which is cleaner, snowcoaches or snowmobiles. However, it is clearly indicated that the reduced number of vehicles, keeping visitation constant, in a snowcoach only alternative would dramatically reduce pollution. The key factor in reducing pollution from snowmobiles is similarly to reduce the number of snowmobiles.</p>

LETTER 4. STATE OF MONTANA, OFFICE OF THE GOVERNOR

COMMENT:

There are no recorded violations of state or national air quality standards at West Yellowstone during the past four winter seasons, contrary to public perception. Even so, it is appropriate to reduce emissions for improved air quality and improved human health conditions. Use of bio-fuels and lubes can reduce emissions in some snowmobiles. Snowmobile technology changes are very promising in reducing emissions, judging by results of the Clean Snowmobile Challenge and progress by manufacturers. Snowcoach technology has made little improvement and it is not likely that no improvement will be made in the next ten years. Snowmobiles are more affordable while snowcoaches are expensive and there is less retail incentive for industry to improve the technology. Continued snowmobile access will encourage investment toward cleaner, quieter machines.

RESPONSE:

It is reasonable to expect, based on modeling results, that NAAQS standards could be exceeded periodically under conditions proposed in alternatives 2 and 3. NPS would not overlook any potential action to reduce pollution. This is the intent of the “Best Available Technology” feature in alternative 3. During the earlier EIS process, the argument was put forward by industry in regard to its inability to improve on snowmobiles – despite the fact that in several alternatives NPS was providing 8-10 years to allow for improvement. Apparently the existing decision provided an incentive for making an effort to improve in a much shorter time frame. There is no reason to believe snowcoaches cannot similarly be improved.

WILDLIFE IMPACTS

COMMENT:

Concern has been raised throughout the document that impacts to wildlife are excessive and a bias against snowmobiles is evident. While a thesis by Amanda Hardy of MSU presents that both elk and bison reflect initial negative responses to human activity, the thesis further suggests that both species appear to habituate to traffic throughout the winter recreation season.

RESPONSE:

Habituation is, in and of itself, an impact on a wildlife population that is to be managed as part of natural ecosystem processes. There are demonstrable impacts on wildlife from snowmobile use, and these impacts are disclosed in the EIS. It is not necessary that an impact occur at the population level in order for an impact on wildlife to be evident. Disturbance, stress, displacement, mortality, and harassment are impacts. It is up to the decision maker to determine a course of action, based on disclosure of impacts, in light of law and policy.

COMMENT:

The SDEIS dismisses these conclusions of evidence and reverts to anecdotal observations obtained by Park personnel. The SDEIS concludes with no evidence whatsoever that “elk FGC levels increased with increasing amounts of traffic indicates that non-observable responses do occur and may contribute to chronic stress. Chronic stress may affect resistance to disease and survival, and may inhibit reproductive potential.”

LETTER 4. STATE OF MONTANA, OFFICE OF THE GOVERNOR	
RESPONSE:	See previous response. Also, the evidence found in a preponderance of cited literature and science research – much having been developed in Yellowstone – shows that motorized use does affect wildlife. Because it has not yet been accepted that such effects materially impact an entire population (some credible scientists believe that it does), this does not mean that law or policy is not violated.
COMMENT:	While most harassment, herding and unsafe attempts to bypass wildlife in roadways is currently the result of motorized users, it is important to keep in mind that overwhelming use of YNP is motorized use. If snowmobile use is banned, predominate use will be by nonmotorized users, thus increasing harassment by nonmotorized users. Considering the Hardy thesis, this may actually increase harassment.
RESPONSE:	In accordance with the existing decision, nonmotorized use is limited to areas or trails that are not in critical or important winter wildlife habitat. NPS believes a conclusion that wildlife is more affected without snowmobiles than with them was not made, and would not be supported by, the indicated research.
COMMENT:	Prohibiting snowmobile use would not lessen impacts to wildlife, but instead probably increase negative impacts by off-trail users. If the objective is to minimize impacts on wildlife, the DSEIS fails to consider in proper analysis, the impacts to wildlife from increased nonmotorized users.
RESPONSE:	See previous response. There are two SEIS alternatives that include snowmobile use. The issue is: what are the impacts of snowmobile use, and how may they be effectively mitigated to be consistent with other park resources and values?
SOCIOECONOMIC	
COMMENT:	While socioeconomics cannot be the driving force behind decisions to protect Park resources, greater recognition of the impacts associated with all alternatives should be acknowledged. Implementing alternatives that severely restrict motorized access to Yellowstone would have potentially devastating effects on the community of West Yellowstone. Citing a study by James Sylvester, it is estimated that West Yellowstone will lose 10-15 million dollars annually in non-resident expenditures.
RESPONSE:	The decision that has been made was in full knowledge of potential impacts on West Yellowstone. The cited study neglects the potential benefits of opening Yellowstone to new markets, while myriad opportunities still exist for snowmobiling in the West Yellowstone area. Rationale for the decision was more optimistic about the ability of businesses to adapt and diversify.

LETTER 4. STATE OF MONTANA, OFFICE OF THE GOVERNOR	
COMMENT:	Small business owners acknowledge and endorse limits on snowmobile use and improvements to both noise and air emissions as necessary to protect the park.
RESPONSE:	No response necessary.
MONTANA’S PREFERRED ALTERNATIVE	
COMMENT:	Montana prefers alternative 2 with changes in allowable use. The daily cap should be held at 900 at West Yellowstone until a visitor capacity study is complete. Randomly moving limits downward prior to the results of the visitor capacity study is unnecessary and does not meet any specific goals. While adaptive management provides flexibility to managers, it provides no assurance to business owners who do not have the luxury of this type of flexibility. Alternatives 1a, 1b and 3 are entirely unacceptable to the State of Montana.
RESPONSE:	The description of alternative 2 will remain the same as in the DSEIS, except as amended by Wyoming. Adaptive management has been touted by most Cooperating Agencies as allowing flexibility – to the benefit of those who use the park for this purpose. NPS need not respond to the commenter’s preference for a decision.
COMMENT:	Park personnel have repeatedly stated their belief that any reduction in snowmobile numbers will be transferred to snowcoach and nonmotorized access, and that they endeavor to maintain current use rates of YNP. Small business owners have repeatedly stated they would accept substantially reduced snowmobile access as long as current visitor use is maintained. Concern is not snowmobiles per se, but “heads in beds.” Business will adapt to access changes so long as visitation remains the same.
RESPONSE:	There has been no change, from the beginning of the original EIS until today, in NPS’ stated intentions about maintaining visitation while reducing impacts.

LETTER 5. PARK COUNTY, WY, BOARD OF COMMISSIONERS
COMMENT: Provides the comments of Paul Kruse. We agree with NPS’ proposed use of adaptive management in allowing for continued use of the Parks by all forms of winter travel as described in Alternative 2. Your evaluation capability and ability to meet changing visitation situations and technology will be greatly enhanced. Timely and relevant data and information would be of major importance, as would its analysis and reporting for decision makers.

LETTER 5. PARK COUNTY, WY, BOARD OF COMMISSIONERS

RESPONSE:

Adaptive management is not a feature solely of alternative 2. It is a feature in two FEIS alternatives, as well as alternatives 1a, 1b, and 3 in the SEIS. See responses to Paul Kruse.

LETTER 6. STATE OF WYOMING, DEPARTMENT OF STATE PARKS AND CULTURAL RESOURCES

COMMENT:

The State of Wyoming provided comments from several state agencies: Department of State Parks and Cultural Resources, Department of Environmental Quality (Air) and Game and Fish Department (50 pages plus attachments “Supplemental Over-snow Vehicle Sound Level Measurements, pictures of alleged snowcoach impacts, and Draft Report of Visitor Capacity on Public Lands and Waters: Making Better Decisions). Wyoming does not believe that the previous decision to ban snowmobiles and depend solely on snowcoaches provides reasonable or dependable access to these parks. We believe previous decisions as well as actions proposed in the DSEIS have been based upon flawed data and assumptions.

RESPONSE:

The function of the SEIS is not to revisit FEIS analyses, but to analyze new data relative to snowmobile technology.

COMMENT:

A strong concern by the State of Wyoming regards the selective review and analysis of data used throughout this process by the NPS and EPA. It appears that data compiled by or selected for use by these agencies is considered sacred and beyond reproach, while data compiled by the State of Wyoming or any of the Cooperating Agencies is viewed as somehow tainted or biased.

RESPONSE:

All relevant and appropriate data, regardless of its source, has been acknowledged and used to the extent possible within the allotted time frame.

COMMENT:

Overall, Wyoming supports the general concepts presented in Alternative 2. Wyoming has suggestions for refining or improving the alternative. Wyoming believes that many management actions proposed in the other alternatives are not reasonable and would prevent the park service from meeting its dual obligation – going too far toward conservation at the expense of reasonable access for the public to enjoy the parks. Wyoming is opposed to 1a or 1b, having serious concerns about a snowcoach system. Furthermore, there have been many serious errors in calculating the potential impacts of snowcoach travel in the parks that have resulted in a serious underdisclosure of their potential impacts.

RESPONSE:

Alternative 2 in its DSEIS form was crafted by the State of Wyoming. Snowcoaches are not the issue: the issue being analyzed in the SEIS is improved snowmobile technology and how it can mitigate the impacts disclosed in the FEIS.

**LETTER 6. STATE OF WYOMING, DEPARTMENT OF STATE PARKS AND
CULTURAL RESOURCES**

COMMENT:

Wyoming requests that NPS reevaluate all stated impacts of snowcoaches based upon the fact that vans converted into snowcoaches have significantly higher emissions than light-trucks and, therefore, snowcoach emissions in the DSEIS are understated by nearly 50%. Sound levels used to calculate snowcoach impacts were also inaccurate which led to flawed and understated impacts. Wyoming is concerned that parks are promoting the Mattrack van conversions as the “current best available technology” and the answer to all future transportation needs in the Parks.

RESPONSE:

A comprehensive evaluation of options available for assuming emission factor and sound inputs has been accomplished. The results are to be reflected in air quality and sound modeling for both snowcoaches and snowmobiles. The best available data for modeled winter vehicle transport is to be used in the FSEIS. Snowcoach emissions are not understated to the degree indicated by Wyoming. NPS intends to make clear that best available technology (BAT) snowmobiles, though cleaner and quieter, are not clean and quiet. NPS looks for continually improving technology. This concept also applies to snowcoaches. NPS has demonstrated, considering total visitation, snowcoach-only access has fewer impacts than any alternative that allows snowmobile access.

COMMENT:

Wyoming supports requiring only “cleaner and quieter” snowmobiles for entry into the parks.

RESPONSE:

No response necessary.

COMMENT:

Wyoming questions whether NPS can legally require “best available technology” for snowmobiles and snowcoaches allowed to enter the parks. It seems that EPA has this authority while NPS does not. A similar EPA rule is unlawful (found in American Corn Growers Assn v. EPA) because it undermines the states’ ability to decide how best to address the situation.

RESPONSE:

NPS has the jurisdiction and authority to control and regulate the types of vehicles and the types of uses allowed within the parks. BAT, implemented through a concession permit system falls within that authority. This is the approach taken in alternative 3. It is NPS’ opinion that it does not have the authority to implement alternative 2.

COMMENT:

Wyoming believes it is important for the public to be able to visit the Parks in the winter on an individual/personal basis. It is clearly obvious to Wyoming that this personal transportation can only be reliably provided by snowmobiles.

RESPONSE:

Allowing any recreation use must be consistent with park resources and values, in accordance with laws and policies.

<p align="center">LETTER 6. STATE OF WYOMING, DEPARTMENT OF STATE PARKS AND CULTURAL RESOURCES</p>
<p>COMMENT:</p> <p>Wyoming is opposed to the proposal in Alternative 3 that would require all snowmobilers in Yellowstone to be accompanied by a guide who is permitted by NPS. It is inherently wrong and unjustified. It may be appropriate for 70 to 80% of snowmobile visitors, but not all.</p>
<p>RESPONSE:</p> <p>See response to comment 6. There is nothing inherently wrong or unjustified about taking appropriate steps to protect park resources and values.</p>
<p>COMMENT:</p> <p>Wyoming is opposed to the proposal in Alternative 3 that would close the Parks to snowmobile access the Friday after Presidents' Day. Such a closure would eliminate about a third of an already short season. There is no justifiable reason for this other than pure bias against motorized access.</p>
<p>RESPONSE:</p> <p>A large percentage of the public, as gaged by the body of comment on the DSEIS, believes that motorized use monopolizes the entire winter season and that there is no time for others to enjoy peace and solitude. As a matter of balancing uses and addressing this need, it is reasonable to allow a portion of the season to be snowmobile-free. Alternative 3 would close the park to snowmobiles the Friday after President's Day weekend. In the average year, the amount of time that would be available, snowmobile-free, is a week. This week coincides with the beginning of road-plowing efforts, warmer temperatures, problematic grooming, and generally poor snow conditions. It would be more reasonable to allow for a quiet time during the peak of the winter season.</p>
<p>COMMENT:</p> <p>Wyoming supports a daily reservation system and interim daily caps for snowmobile entry into YNP. The interim daily caps should reflect historic use numbers and the reservation system should be implemented at gates where daily caps would allow fewer snowmobiles per day than what was experienced at that entrance historically. Interim daily limits solve many issues and should be based upon historic daily averages until a long-term visitor capacity study is done. Some safeguards must be in place to prevent damaging the economies of communities like West Yellowstone, Cody and Jackson.</p>
<p>RESPONSE:</p> <p>Adaptive management, or some form of capacity study, should be the determinant for the amount and type of use to be allowed while safeguarding park resources and values. Given the impacts that have been disclosed, the amount of use allowed should be conservative until it is shown that the resources can accommodate higher levels. This is the basis for restricting snowmobile use from West Yellowstone in Alternative 3. The impacts of snowmobile use along the West Yellowstone to Old Faithful Corridor are dramatic. Alternative 3 preserves existing use levels via snowmobile from the north, south and east.</p>
<p>COMMENT:</p> <p>Wyoming supports the strict enforcement of rules that require snowmobiles and snowcoaches to operate only on the designated roads within the Parks. The 184 miles of existing trail (within YNP) affords adequate and appropriate access.</p>

LETTER 6. STATE OF WYOMING, DEPARTMENT OF STATE PARKS AND CULTURAL RESOURCES	
RESPONSE:	The only issue associated with this comment is, like other aspects of alternatives 2 and 3, whether the parks will have adequate funding for effective administration of the winter program.
COMMENT:	Wyoming supports continued fishing access on the frozen surface of Jackson Lake via snowmobile and snowplane. Banning the use of these vehicles is unjustified and would create a hardship for fishermen.
RESPONSE:	The decision to implement this action is justified in the record of decision. This issue has nothing to do with improved snowmobile technology, which is the rationale for producing an SEIS.
COMMENT:	Wyoming is opposed to the NPS proposal to quit plowing the roadway between Flagg Ranch and Colter Bay. With snowcoach travel only, this will effectively eliminate day-access from Wyoming to Old Faithful and other destinations within YNP. Furthermore, this proposal is likely to result in a closure of Flagg Ranch Resort since it would no longer be feasible to operate in the winter.
RESPONSE:	The decision to implement this action is justified in the ROD. This issue has nothing to do with improved snowmobile technology.
COMMENT:	Wyoming supports a lower speed limit of 35 mph from West Yellowstone to Old Faithful, and for strict enforcement of the speed limits in the parks. It is a simple way to improve safety and visitor experience, while reducing sound levels and the potential for conflicts.
RESPONSE:	No response necessary.
COMMENT:	Wyoming supports: expanding educational efforts, along with community/state/other partners, pertaining to safe and responsible use of the parks; requiring advance sale of park permits in West Yellowstone and at other entrances is sufficient use levels justify. Other refinements are possible to improve the advance sale and entry process.
RESPONSE:	No response necessary.
SECTION 2: CHANGES REQUESTED FOR WYOMING'S ALTERNATIVE 2.	
COMMENT:	Suggests the reduction of interim daily limit numbers because there must be immediate action at the West Entrance to reduce peak use that has continually aggravated the winter use debate.

LETTER 6. STATE OF WYOMING, DEPARTMENT OF STATE PARKS AND CULTURAL RESOURCES	
RESPONSE:	If there is sufficient time in which to re-run all models, this could be done. It is difficult to resolve this position with that of the State of Montana, which is to hold use at 900 until a capacity study is done.
COMMENT:	Suggests that decreases for later years only be implemented if there are a commensurate number of seats available on “new concept snowcoaches.”
RESPONSE:	NPS will reflect this change as requested.
COMMENT:	Delete language delaying entry from West Yellowstone until 8:30 A.M. daily.
RESPONSE:	NPS will reflect this change as requested.
SECTION 3: GENERAL COMMENTS AND QUESTIONS ABOUT THE DSEIS.	
COMMENT:	EPA and NPS continue to mistakenly put credence into the false hypothesis that snowcoach emissions are the same as a light-duty truck. They have not done a single thing to determine factual data regarding snowcoach emissions. Wyoming/SWRI are responsible for the first and only study on the subject, which should be used for FSEIS modeling.
RESPONSE:	The FSEIS will contain a discussion of this issue. NPS states that no apparent serious errors have occurred in calculating potential air quality impacts from snowcoaches. NPS is prepared to support its analysis as being the most technically feasible analysis possible considering the absence of data on snowcoach emissions. In deference to this criticism, NPS has to date selected emission factors that tend to overstate the impacts of snowcoaches. A comprehensive evaluation of options available for assuming emission factor inputs has been accomplished. The results are to be reflected in air quality modeling for both snowcoaches and snowmobiles.
COMMENT:	Air quality modeling is based on a worst-case analysis and should not be construed to predict actual violations of ambient air quality standards with any certainty.
RESPONSE:	These models are not to be construed as a worst-case analysis. They attempt to replicate normal/average conditions of use and environment. NPS is unsure of what is meant by predicting “actual” violations. The models indicate that violations could occur under the hypothetical conditions represented, and given the assumptions that underlie the analysis. As such, modeled violations should be treated as a warning flag, and management programs should consist of measures intended to avoid those conditions.

LETTER 6. STATE OF WYOMING, DEPARTMENT OF STATE PARKS AND CULTURAL RESOURCES	
COMMENT:	The reported results (SwRI) for supplemental measurement of snowcoach sound is appended to Wyoming comments.
RESPONSE:	No response necessary.
COMMENT:	Wyoming observes that Mattrack conversion vans cut trenches and damaged the groomed snow road surface. This type of damage was not observed with other snowcoach types or snowmobiles.
RESPONSE:	NPS notes that the representative from Wyoming was very concerned about the softness of the groomed snow surface at the time and place of the field study. Photographs of alleged trail damage from snowcoaches that accompanied Wyoming's comments were apparently taken during this exercise.
COMMENT:	Snowcoaches herd bison too. A predominate experience with snowcoach drivers was that they were even more impatient than the snowmobilers. All users need better education on what to do when encountering bison on the roads.
RESPONSE:	NPS agrees in regard to the need for better education. There is no way to verify the impatience quotient of snowcoach drivers versus snowmobilers.
SECTION 4: SPECIFIC PAGE-BY-PAGE COMMENTS	
COMMENT:	Wyoming attaches 18 pages of detailed and specific comments. For the most part, the comments are related to the issues summarized above.
RESPONSE:	The specific comments have been reviewed and considered. Those that apply to information in the final document will be further considered.
COMMENT:	Wyoming continues to object to the inclusion of the referenced "survey" in the text and Table 20. It is inappropriate and also violates NEPA and CEQ standards since it is based purely on anecdotal versus scientific data that lends itself to personal bias.
RESPONSE:	NPS recognizes that the survey does not meet scientific rigor. However, it provides evidence of snowmobiling conditions based on professional park rangers' experience working in Yellowstone on a daily basis. This survey is intended to supplement other scientifically valid studies, which are detailed in the SEIS that support the conclusion that winter recreation can be harmful to wildlife.

<p align="center">LETTER 6. STATE OF WYOMING, DEPARTMENT OF STATE PARKS AND CULTURAL RESOURCES</p>
<p>COMMENT:</p> <p>Section 5: Specific Comments Submitted by the Wyoming Game and Fish Department. G&F attaches 5 pages of detailed and specific comments. Key points are as follows.</p>
<p>RESPONSE:</p> <p>The specific comments have been reviewed and considered. Those that apply to information in the final document will be further considered and addressed.</p>
<p>COMMENT:</p> <p>Standards for triggering management actions under the adaptive management concept: appear to be adequately defined for alternatives 2 and 3. Standards are not adequately defined for alternatives 1a or 1b. The definition of “disturbance” is totally exclusionary, and should be made more realistic.</p>
<p>RESPONSE:</p> <p>Standards and definitions will be reviewed. Wyoming’s comments will be reviewed for specific criticisms of 1a and 1b standards.</p>
<p>COMMENT:</p> <p>Environmental consequences: Wyoming takes issue with wildlife impact definitions and their application. Wyoming believes that regardless of the level of impact, adaptive management will be sufficient to protect park wildlife resources and that the impact levels for all alternatives should be equally negligible.</p>
<p>RESPONSE:</p> <p>The disclosure of impacts by alternative must reflect the reasonably foreseeable effects in terms of their magnitude, duration and intensity. It is not sufficient to say that over time all impacts are mitigable, negligible, and therefore the same.</p>
<p>COMMENT:</p> <p>Jackson Lake: the abrupt discontinuance of motorized winter access to a significant fishery would mean a significant decrease in visitor use, access and experience. Alternative 3 should include access for snowmobiles for fishing purposes. Snowplanes should be allowed continued access for ice-fishing, and scheduling could be done to mitigate sound issues.</p>
<p>RESPONSE:</p> <p>Alternative 2 provides the choice of allowing snowmobiles on Jackson Lake. NPS disagrees with the assessment provided by the state regarding the significance of the adverse impact on fishermen relative to the benefit of restricting motorized use on the lake. Nothing in this comment is germane to the issue of improved snowmobile technology.</p>
<p>COMMENT:</p> <p>Section 6: Specific Comments Submitted by the Wyoming Department of Environmental Quality. DEQ attaches 6 pages of detailed and specific comments. Key points:</p>
<p>RESPONSE:</p> <p>The specific comments have been reviewed and considered. Those that apply to information in the final document will be further considered and addressed.</p>

<p align="center">LETTER 6. STATE OF WYOMING, DEPARTMENT OF STATE PARKS AND CULTURAL RESOURCES</p>
<p>COMMENT:</p> <p>DEQ is disconcerted that the DSEIS states that the worst case analysis modeled air quality impacts “threaten or exceed” ambient air standards. The modeled impacts or based on a worst case analysis and should not be construed to predict violations of ambient air quality standards with certainty.</p>
<p>RESPONSE:</p> <p>These analyses are not to be construed as worst-case scenarios. See response to above comments. Attainment designations are routinely based, in part, on modeled predictions of violations.</p>
<p>COMMENT:</p> <p>DEQ makes a number of suggestions or arguments regarding the wording of adaptive management standards, or other entries in the adaptive management tables, and the Appendix E monitoring tables.</p>
<p>RESPONSE:</p> <p>These comments will be considered for the FSEIS.</p>
<p>COMMENT:</p> <p>DEQ provides preliminary information on air quality monitoring at Flagg Ranch.</p>
<p>RESPONSE:</p> <p>These existence of these preliminary data will be reflected in the FSEIS narrative.</p>
<p>COMMENT:</p> <p>DEQ objects to the performance of a PSD increment analysis, as it believes that this must be done only by those entities (states) having primacy under the Clean Air Act. It also objects to fictitious visibility modeling when visibility is already monitored in YNP by an IMPROVE aerosol monitor.</p>
<p>RESPONSE:</p> <p>Clean air, including visibility, is a national park resource. NPS management of activities to protect this resource does not interfere with the authority of states or EPA under the Clean Air Act. IMPROVE is related to the monitoring of regional haze and as such it is not the appropriate method for monitoring localized, near-field visibility impairment associated with winter use activities. The IMPROVE monitor is not sited, or otherwise configured to assess these visibility impacts. Visibility regulations recognize visual observation, such as photo series and time-lapse video, as preferred techniques for identifying sources of visibility impairment. NPS has used the VISCREEN Version 1.01 to model visibility impacts. NPS believes the PSD analysis is a necessary component of the disclosure for air quality impacts.</p>
<p>COMMENT:</p> <p>Wyoming was not provided with a copy of the NPS consultant’s draft report cited in the DSEIS as EA 2001 – it is not possible to fill its role as a cooperator without additional time to review the report.</p>

LETTER 6. STATE OF WYOMING, DEPARTMENT OF STATE PARKS AND CULTURAL RESOURCES

RESPONSE:

The consultant's report cited as EA 2001 was reproduced nearly in its entirety in the DSEIS. The preparation of the DSEIS was nearly concurrent with the receipt of the report from the consultant.

Government-Related or Agency Letters Other Than Cooperating Agencies (13 Letters)

LETTER 7. BLAINE COUNTY COMMISSIONERS, IDAHO.

THE WRITER IS AN ELECTED COUNTY COMMISSIONER, ALSO WRITING AS PRESIDENT OF THE WINTER WILDLANDS ALLIANCE.

COMMENT:

I support phasing out snowmobiles from YNP. A diverse winter recreation program is important to local economies. The ban on snowmobiles in YNP would provide a more diverse, sustainable economy for West Yellowstone and attract new winter visitors, once it is not dominated by one recreation that prevents others from experiencing Yellowstone with its natural quiet, clean air and pristine beauty. These qualities are expected in our national parks and this is reflected in editorials across the country supporting this ban. Snowmobiling will continue to play a part in West Yellowstone's economy with over 400 miles of trail on adjacent lands.

RESPONSE:

NPS' economic analysis shows that there will be adverse economic impacts on West Yellowstone, Montana. These impacts are characterized as short-term, since many people will continue to snowmobile in the area for reasons cited in this comment. NPS has maintained that the existing decision creates a new market, based on snowcoach access to the park, that the community can take advantage of.

LETTER 8. CONFEDERATED SALISH AND KOOTENAI TRIBES

THE WRITER'S TITLE IS TRIBAL PRESERVATION ASSISTANT.

COMMENT:

Our tribes would like to know if this would affect any Cultural Resources that may be in the area of impact. If there are, will there be a plan to protect them?

RESPONSE:

The FEIS published earlier, to which this supplemental document is tiered, found no impacts on cultural resources from any of the alternatives considered. Since the SEIS alternatives are within the range of alternatives considered in the FEIS, there was no need to reconsider cultural resources. The existing analysis and disclosure is sufficient.

LETTER 9. HONORABLE RUSH HOLT, MEMBER OF U.S. HOUSE OF REPRESENTATIVES

COMMENT:

I am writing to support the NPS decision to phase out snowmobile use in Yellowstone and Grand Teton National Parks. I support a snowcoach transportation system that will minimize wildlife harassment, reduce air and noise pollution, and protect employee and visitor health and safety.

RESPONSE:

No response necessary.

COMMENT:

The original NPS rule is based on a long-standing bipartisan commitment to the protection of our National Parks. Based on the science, the NPS concluded that snowmobile use is impairing resources in the parks, in violation of the NPS Organic Act's mandate that the Service manage parks to "leave them unimpaired for the enjoyment of future generations." The Service also found that the snowmobile use is "inconsistent with the requirements of the Clean Air Act, Executive Orders 11644 and 11989 (by Presidents Nixon and Carter, relating to off-road vehicle use on public lands), the NPS' general snowmobile regulations and NPS management objectives for the parks." These requirements are all based on a long-standing, bipartisan commitment that our National Parks be given the highest level of protection. The strictest and most detailed government standards applying to snowmobile use in national parks – Executive Order 11644 and the Service's general snowmobile regulations – were adopted by President Nixon and during the Reagan Administration.

RESPONSE:

This comment is consistent with the findings in the 2000 Record of Decision.

COMMENT:

In YNP snowmobiles carrying 80,000 people produce more air pollution each year than all the cars and trucks that carry three million other visitors in to the park. According to NPS' Air Resources Division, automobiles outnumber snowmobiles 16 to 1 during the course of a year in Yellowstone, yet snowmobiles produce up to 68% of its carbon monoxide pollution and up to 90% of the Park's annual hydrocarbon emissions. Regardless of new technology addressing this issue, wildlife harassment will continue if any snowmobile use occurs in the park units.

RESPONSE:

Alternative 3 in the SEIS attempts to mitigate (lessen) this impact by providing that snowmobiles enter the parks in lower numbers than at present from the West Entrance to Old Faithful where most serious wildlife impacts occur. In this alternative, an NPS permitted guide equipped with the knowledge necessary to avoid, to the extent practicable, impacts on wildlife that may be encountered, would accompany all snowmobiles.

**LETTER 10. THE SHOSHONE-BANNOCK TRIBES
THE WRITER’S TITLE IS TRIBAL ANTHROPOLOGIST**

COMMENT:

The SEIS does not adequately address concerns of Native Americans. Nor does it clearly define how consultation would be conducted with the different tribes that have ties to the Greater Yellowstone Area. The GYA is a traditionally sensitive place to the Shoshone and Bannock people, and the Parks Service has a trust responsibility to ensure the protection and preservation of natural and cultural resources.

RESPONSE:

The FEIS published earlier, to which this supplemental document is tiered, found no impacts on cultural resources or Native American concerns from any of the alternatives considered. Since the SEIS alternatives are within the range of alternatives considered in the FEIS, there was no need to reconsider such impacts. The existing analysis and disclosure is sufficient. This determination, and necessary references for purposes of tiering, is provided on pages 79-81 of the DSEIS.

COMMENT:

The tribes are very concerned by the continued winter use in the areas often frequented by bison herds. It’s disturbing to read how some winter users deal with bison that are “in their way.” The Shoshone and Bannock people regard the bison as sacred and should be treated with respect.

RESPONSE:

Impacts on bison are presented in both the FEIS and the DSEIS. NPS is similarly concerned with adverse impacts on one of the signature values of national parks. Bison are displaced, stressed, harassed, and injured by motorized winter vehicles during a time they can least afford such impacts.

LETTER 11. HONORABLE CRAIG THOMAS, MEMBER OF U.S. SENATE

COMMENT:

The status quo regarding the use of snowmachines in Yellowstone and Grand Teton National Parks should not continue. Unfortunately, NPS’ inability to manage snowmobile traffic in the parks has led it to consider the drastic step of banning all snowmachine access. This overreaction would deny taxpayers, the rightful owners of these national treasures, access to their parks. NPS should protect the environment and the public’s expectation for a quality visit to our national parks by requiring stringent management changes.

RESPONSE:

The existing decision controls use, not access. NPS agrees with the overall assessment in this comment, except to note that a significant percentage of the public has an expectation for enjoying the parks without the impacts associated with snowmobiles. NPS’ inability to manage has in part been a function of political action. If management and analysis needs had been heeded all along, it is possible that snowmobile use would not have been allowed to continue. From that standpoint, the existing decision is not an overreaction.

LETTER 11. HONORABLE CRAIG THOMAS, MEMBER OF U.S. SENATE**COMMENT:**

I remain concerned about NPS' treatment of information presented by the cooperators as not pertinent to the issue. These points of view must be adequately considered by the Park Service in order to make an intelligent decision on this issue. The bottom line is that the public must continue to have access to their parks and that can be accomplished in a safe and environmentally sound manner.

RESPONSE:

NPS has fully considered information presented by the cooperators. Some of the information submitted was not new, and had previously been considered, some was not within the scope of analysis as set out in the settlement agreement. Some was not credible or science-based, a standard to which the cooperators rightly hold NPS. The existing decision does not prevent public access to any of the parks. NPS believes it must consider the views of the Cooperating Agencies and of the other (approximately) 370,000 people who submitted comments.

LETTER 12. REPRESENTATIVE HARRY B. TIPTON, WYOMING STATE LEGISLATURE**COMMENT:**

I am a cross-country skier and don't like the noisy, smelly snow machines. However, the use in the national parks has become a major activity with many economic aspects. With the new designs it would appear that some of the objections are being mitigated. Certainly the number of snowmachines using YNP in the winter cannot compare with the millions of automobiles during the major tourist season. These same concerns regarding pure air, the safety of wildlife and a quiet place to enjoy nature would apply to summer use as well.

RESPONSE:

The primary concern for park management is to conserve and protect resources. When a use may be adversely impacting park resources and values, NPS must act in accordance with its mandate. New technology mitigates some, but not all, concerns. The impacts of snowmobiles are, in fact, far greater than those associated with automobiles due to a number of factors discussed in the EIS. NPS agrees that some of the same issues apply to summer use, but believes they must receive due consideration in a separate analysis.

LETTER 13. USDA NATURAL RESOURCE CONSERVATION SERVICE**COMMENT:**

NRCS operates nine SNOTEL sites in YNP. Snow data collected at the sites is an imperative element in forecasting runoff from the mountains in that area of Wyoming Montana, and Idaho. These data are important for reservoir management, flood and weather forecasting, and farm and ranch operations. The sites require winter maintenance. NRCS would like this essential activity to be included in the SEIS in the same manner as shown for Park employees in Chapter 2, page 35.

LETTER 13. USDA NATURAL RESOURCE CONSERVATION SERVICE

RESPONSE:

The existing decision (and alternatives to it) applies to recreational use via motorized off-road vehicles. Regulations, executive orders, laws and policies, which provide a mandate for regulating such uses, also provide exceptions for administrative and official use. Permits may be obtained on a case-by-case basis for activities other than those covered in the decision. It should be expected that the permit would require use of “cleaner and quieter” snowmobiles, much as the administrative snowmobile fleet will need to meet this requirement.

LETTER 14. U.S. HOUSE OF REPRESENTATIVES, COMMITTEE ON SMALL BUSINESS

THE WRITER IS CHAIRMAN OF THE SMALL BUSINESS COMMITTEE OF THE US HOUSE OF REPRESENTATIVES

COMMENT:

The SEIS is inadequate because it fails to properly consider: the socioeconomic impacts associated with limiting snowmobile use as it affects small businesses throughout the nation and the small communities adjacent to the two parks; reasonable alternatives that mitigate environmental harm without limiting access to snowmobiles; and the adverse environmental consequences of snowcoach use in the two parks.

RESPONSE:

There is no requirement in NEPA specifically to consider in an EIS impacts on small businesses, and there clearly is no responsibility to find effects on small businesses beyond the geographic scope of the analysis at hand. There are other requirements relative to small businesses that accrue to the rule making process. Ref: CEQ regulations at 40 CFR 1502.16, 1502.23, 1508.8, and 1508.27. The EIS addresses economic impacts at the regional, state and county areas, which is a level of analysis NPS considers more than adequate to meet NEPA requirements. Available economic data of the type that allows analysis of alternative impacts is suitable only to the county level, not below. NPS will engage other analysis strategies in an attempt to characterize community-level impacts that hopefully would address this small business concern. However, the EIS does not fail on this point.

COMMENT:

I am concerned that the SEIS will not provide a sufficient basis upon which to base a record of decision for modification of the winter use management plan. An adequate SEIS would demonstrate that the NPS can adopt a winter use management plan that protects unique ecosystems of YNP and GTNP without severe damage to small businesses and the small rural communities that abut the two parks. For example, the SEIS should examine an alternative of historic snowmobile visitation patterns limited to 4-stroke engines.

LETTER 14. U.S. HOUSE OF REPRESENTATIVES, COMMITTEE ON SMALL BUSINESS

THE WRITER IS CHAIRMAN OF THE SMALL BUSINESS COMMITTEE OF THE US HOUSE OF REPRESENTATIVES

RESPONSE:

See previous response. NPS refutes the notion that there will be severe damage to small businesses. It is interesting to note that predictions of severe economic consequences were made by Cooperating Agencies in regard to all alternatives in the DEIS, except for the no action alternative. Among these were alternatives proposing cleaner and quieter snowmobiles, with standards to be set over a period of years by advisory committees. If SEIS alternatives 2 and 3 had been considered earlier, they too would likely have been painted with the same brush as unrealistic, not implementable, and too burdensome on industry. Reference FEIS Volume III Part 1 – comments and responses. It was only after the November 2000 decision, in comments on the rule, that snowmobile advocates and others began to suggest the possibility of requiring cleaner and quieter machines, reducing numbers and requiring guides instead of banning snowmobiles.

COMMENT:

NPS should consider that reductions in snowmobile usage in YNP have an indirect effect that reverberates throughout the American economy.

RESPONSE:

The commenter offers no evidence for this assertion. The FEIS and SEIS analyses show negligible (or no) state and regional economic impacts, using commonly accepted economic analysis models.

COMMENT:

NPS predetermined, without any analysis, that there must be a reduction in the use of snowmobiles in the two parks irrespective of the actual environmental effects of the use of 4-stroke engines on the environment. The exclusion of a viable alternative undercuts the primary objective of preparing an EIS.

RESPONSE:

The DEIS and FEIS presented a range of alternatives, most of which allowed snowmobile use. A decision to disallow snowmobile use followed due consideration of all alternatives and their impacts. It is not clear to what the commenter is referring in the use of the word “predetermined.” It is not clear what viable alternative has been excluded given the full range of alternatives considered.

LETTER 15. U.S. SMALL BUSINESS ADMINISTRATION, OFFICE OF ADVOCACY
THE LETTER IS SIGNED FOR THE CHIEF COUNSEL FOR ADVOCACY

COMMENT:

This letter raises new questions, based on the SEIS, about the NPS decision to certify the final rule, in lieu of preparing the Final Regulatory Flexibility Analysis or FRFA. Section 605 of the RFA allows an agency head to certify the rule if it is not expected to have a significant economic impact on a substantial number of small entities. The RFA certification is based on the FEIS, however new facts regarding the impact were revealed in the SEIS. Advocacy therefore recommends that NPS withdraw the certification and amend it.

RESPONSE:

NPS believes that there were no new facts of a substantially different nature presented in the DSEIS. In the DSEIS, NPS acknowledged the receipt of information described as new, and other information that did not materially change the analysis of economic impacts. See DSEIS Table 35. NPS will, if necessary, propose a regulation to implement its decision in that process. At that time, NPS will comply with all applicable regulatory requirements.

LETTER 16. VALLEY COUNTY, IDAHO: CLERK OF THE DISTRICT COURT
THE LETTER WRITER IS THE COUNTY CLERK

COMMENT:

Valley County urges you to support Alternative 2 that was developed by many Cooperating Agencies. With continuing growth in winter recreation, all of us realize it will bring the need for more education and unfortunately more rules and regulations. We would hope that “common sense” can prevail. It is not unreasonable to control high use peak days. It is not unreasonable to set some emissions standards as long as they are based on science. Hours of operation may need to be set along with speed limits. The best policy is to try and mitigate effects and avoid “lock downs” or “closures.” It is your responsibility to form partnerships with the surrounding communities, counties and other agencies so that a joint cooperative effort is formalized.

RESPONSE:

Alternative 2 was developed by the State of Wyoming. It appears to be supported by the other Cooperating Agencies, although the States of Idaho and Montana have envisioned different use scenarios (numbers of snowmobiles allowed) and guided permit requirements. All the suggested approaches are or have been present in the range of alternatives considered throughout this process. The notion of applying common sense must begin with the need to conserve and protect park resources and values and to consider the needs/desires of other user groups.

LETTER 17. THE CITY OF WALL, SOUTH DAKOTA
THE TITLE OF THE LETTER WRITER IS FINANCIAL OFFICER

COMMENT:

I support alternative 2 that would continue to allow snowmobile access to YNP and GTNP and the Parkway. I do not agree that only four stroke snowmobiles should be allowed. Cleaner emissions should be phased in over a period of years. I do not support any proposal for snowmobiles to be either prohibited or allowed access only with guides.

RESPONSE:

These recommendations or opinions in regard to the decision to be made, unsupported by rationale, require no response.

COMMENT:

The financial impact of closing these parks will affect many surrounding areas. Without the snowmobile traffic going through Wall on their way to YNP and GTNP, our winter income will be severely affected.

RESPONSE:

The commenter offers no evidence for this assertion. NPS' economic analysis, performed using generally accepted economic impact analysis methods, shows little to no regional impact. NPS believes that Wall – well outside the region – would not be affected.

LETTER 18. THE TOWN OF WEST YELLOWSTONE, MONTANA
THE LETTER IS SIGNED BY THE MAYOR AND FOUR COUNCIL REPRESENTATIVES

COMMENT:

Gateway communities fulfill an important role in support of the Park Service's mission to preserve and protect park resources by providing services beyond the park borders. These services allow more visitors without putting additional strain on the natural resources of the parks. Our relationship with parks is symbiotic. It is essential that management decisions protect national treasures and ensure the continued viability of gateway communities.

RESPONSE:

NPS agrees, with the caveat that the continued viability of gateway communities is not the responsibility of the park service, whereas the protection of park resources and values is. NPS is obliged to support gateway communities to the extent that protection of the park is ensured. The difficulty lies in gauging both the point at which resources, values and visitors are adversely affected and the point at which a community is no longer viable. NPS asserts that there is nothing in any alternative, selected or considered, that will render any gateway community as a nonviable entity.

COMMENT:

One of the primary concerns is to ensure that historic winter visitation levels are maintained. We support efforts to incorporate the maintenance of historic visitation levels in the mix of any winter use alternative and urge NPS to include this consideration in its final recommendation of a winter use plan.

<p>LETTER 18. THE TOWN OF WEST YELLOWSTONE, MONTANA THE LETTER IS SIGNED BY THE MAYOR AND FOUR COUNCIL REPRESENTATIVES</p>
<p>RESPONSE:</p> <p>Given comment 1 and its response, NPS appreciates cooperative relationships that continue to exist with various partners in all the gateway communities. NPS believes that historic visitation can be supported, or perhaps increased, with cooperative efforts that support and emphasize improved mass-transit winter access.</p>

<p>LETTER 19. WYOMING COUNTY COMMISSIONERS ASSOCIATION THE LETTER IS SIGNED BY THE EXECUTIVE DIRECTOR OF THE ASSOCIATION</p>
<p>COMMENT:</p> <p>At the Association meeting held on May 3, 2002, the commissioners passed a resolution in strong support of Alternative 2 in the Final SEIS and Record of Decision. The resolution is attached, along with graphics and tables on “wild animal crashes.”</p>
<p>RESPONSE:</p> <p>No response necessary.</p>

Academia (7 Letters)

<p>LETTER 20. CENTRAL MICHIGAN UNIVERSITY DEPARTMENT OF GEOGRAPHY</p>
<p>COMMENT:</p> <p>The enclosed report is submitted for consideration in regard to the DSEIS. It presents the findings of a study of air quality associated with snowmobile use in YNP during February 2000. The study conclusions are as follows: The findings suggest that, holding overall levels of snowmobile usage steady, a reduction in the amount of 2-stroke snowmobile traffic will likely reduce NMHC emissions including the air toxics benzene and toluene. This scenario essentially represents the Winter Use Plans DSEIS Alternative 2. Alternatives 1a, 1b, and 3 will lead to significant decreases in NMHC and air toxic levels in the Park.</p>
<p>RESPONSE:</p> <p>The results confirm that elevated levels of several volatile organic compounds (VOCs), such as benzene and toluene, are directly attributable to snowmobile activity in the park. NPS concurs that alternative 2 would reduce overall emissions of VOCs, but note that VOC emissions would be reduced much more by alternative 3. The study will be discussed and cited in the FSEIS.</p>

<p style="text-align: center;">LETTER 21. DR. GARY BISHOP UNIVERSITY OF DENVER DEPARTMENT OF CHEMISTRY AND BIOCHEMISTRY</p>
<p>COMMENT:</p> <p>Any documents produced by NPS, which argues for one side or the other, should have results which lack obvious errors, are consistent with the best available data and openly include all of the relevant data and modeling inputs. The emissions modeling results provided in Chapter IV of the DSEIS fail all of these criteria and should be amended. A knowledgeable reader is left with the feeling that it was better to do the job fast than do it correctly. It is my opinion that this document, in its current form, will most likely find itself successfully challenged in court. Key points:</p>
<p>RESPONSE:</p> <p>The SEIS, by definition, does not argue for one side or the other; it presents alternatives. It should be noted that the existing decision and rule, effective 2001, eliminate recreational snowmobiling from the parks. NPS acknowledges that the timeframe, set in the settlement agreement, for this analysis is highly limiting with regard to the quality of the analysis and the quality of the document.</p>
<p>COMMENT:</p> <p>Because of many citations in the document, it is imperative to make the document cited as EA 2001 available to the public along with the SEIS before final comments are accepted.</p>
<p>RESPONSE:</p> <p>The cited air quality modeling report is and has been available upon request. The new modeling report, (EA 2001) was reproduced nearly in its entirety in the DSEIS, adequately documenting the methodology, assumptions, emission factors, and other pertinent data necessary to evaluate the modeling. The FSEIS will not make reference to EA 2000.</p>
<p>COMMENT:</p> <p>Emission factors used for the modeling in several instances do not take into account the best available data or are out of date. The CO emission factors for 2000 model year light-duty trucks are just flat out wrong by at least an order of magnitude too high. If this is the real input used for these vehicles, then their emissions have been grossly over-estimated.</p>
<p>RESPONSE:</p> <p>As indicated in the DSEIS text, the emission factors in Table 40 are those used as a surrogate for snowcoaches, not for light duty gasoline trucks (LDGT). These older, dirtier emission factors are more representative of snowcoach operation than the newer LDGT emission factors. However, we concur that it is incorrect to use these emission factors for wheeled vehicles as indicated in Table 43. Accordingly, the emission factors in Table 43 have been revised and are now based on results from the EPA MOBILE6 model specific to YNP. The result of these changes is that emissions from wheeled vehicles account for a much smaller portion of the overall emissions than originally estimated.</p>

<p align="center">LETTER 21. DR. GARY BISHOP UNIVERSITY OF DENVER DEPARTMENT OF CHEMISTRY AND BIOCHEMISTRY</p>
<p>COMMENT:</p> <p>EPA NONROAD model contains very few if any actual snowmobile emission measurements. Any emission factors taken from this source should not be considered representative of fleet wide emissions. A better source would have been from actual measurements of thousands of snowmobiles collected at the West Entrance to YNP and reported in Environ. Sci. Technol. 2001, 35, 2874-2881, Bishop, et al.</p>
<p>RESPONSE:</p> <p>The EPA NONROAD emission factors were used because they represent the largest database of laboratory test results currently available for snowmobiles. Laboratory test results from some 24 separate engine tests were averaged together to create the CO emission factor. In addition, the NONROAD emission factors serve as the basis for the EPA rule that establishes emission standards for snowmobiles (66 FR 51098), and have been subject to the scrutiny of various stakeholders in the rule development process. The use of remote sensing to support mobile source emission inventory development is not well established, nor is it the preferred methodology used by urban areas for planning purposes. It has been utilized successfully for screening purposes in inspection and maintenance programs, but even this application must be used with a full understanding of its limitations. While remote sensing has great potential as an emerging technology, and has provided useful information regarding mobile emissions in YNP, it does not provide emission factors that are the most technically defensible.</p>
<p>COMMENT:</p> <p>The CO, HC and NO_x traveling emission factors for wheeled vehicles are out of date and excessive. Appropriate factors are easily estimated from EPA's annual report of emission trends in the US.</p>
<p>RESPONSE:</p> <p>NPS agrees. The emission factors have been revised and now reflect results obtained from the EPA MOBILE6 model for Yellowstone NP. The result of these changes is that emissions from wheeled vehicles account for a much smaller portion of the overall emissions than originally estimated.</p>
<p>COMMENT:</p> <p>The use of a dispersion model for predicting ambient CO levels is generally very problematic and should be avoided. The lack of any sensitivity testing and disclosure, along with the display of model results, suggests no statistically significant difference between the four modeled alternatives. A suggestion is to compare modeled outputs to hourly averaged CO or PM10 data for one of the sites. The State of Montana has been collecting hourly average CO emissions at West Entrance – this data record should be referenced and included in the final document.</p>
<p>RESPONSE:</p> <p>Response forthcoming from NPS.</p>

LETTER 22. ROBERT B. KEITER, PROFESSOR OF LAW, UNIVERSITY OF UTAH

COMMENT:

The original phase-out decision is consistent with NPS law, including the Organic Act and the Redwood Amendment. The ROD is also consistent with case law, which supports resource protection priorities over recreation, including *Bicycle Trails Counsel v. Babbitt*, *Michigan United Conservation Clubs v. Lujan*, and *Mausolf v. Babbitt*. Subsequent information gathered during the SEIS process has not altered the basic impairment findings. There is no factual basis for reversing the impairment conclusion and phase out decision.

RESPONSE:

NPS states in the final rule implementing the decision that the reintroduction of snowmobiles into the parks can, in light of adverse impacts and impairment of park resources and values, only be accomplished by placing strict limitations on them. Some snowmobile advocates who commented on the earlier proposed rule suggested limiting numbers and requiring snowmobilers to travel in guided groups instead of ending snowmobile use. NPS responded by saying, "to achieve compliance with the applicable legal requirements while still allowing snowmobile use would require very strict limits on the numbers of both snowmobiles and snowcoaches. As a result, that would sharply limit overall winter use of the parks, reducing the opportunities for public enjoyment of the parks and causing even greater adverse impacts on affected gateway communities and businesses. We chose instead to allow use of the parks by snowcoaches, which, because they have far fewer and less extensive adverse impacts than snowmobiles, can be accommodated, we now believe, without numerical limits."

COMMENT:

The decision to permit motorized recreation in America's national parks is based primarily upon environmental considerations, not equal access or local economic concerns. Local economic impacts can be mitigated by affording local motorized recreation businesses the opportunity to compete for a permit or license to help operate an expanded winter snowcoach system.

RESPONSE:

This is essentially NPS' determination in the November 2000 ROD.

COMMENT:

Congress recently reconfirmed the important role of scientific resource management in the national parks with the passage of NPOMA of 1998, which directs park managers to base decisions on science.

RESPONSE:

EPA notes that the FEIS is a strong, science-based environmental document.

LETTER 23. DR. MARY MEAGHER, ANIMAL ECOLOGIST, GARDINER MT

COMMENT:

None of the alternatives in either the FEIS or DSEIS address a critical natural resource problem related to winter use. As an employee of NPS, I was responsible for ecological research on Yellowstone bison over several decades. I hand delivered a copy of my research to the YNP planning office, and note that it does not appear in the DSEIS bibliography. The DSEIS lacks discussion of a topic that is critical to the future of bison in Yellowstone.

RESPONSE:

The FEIS recognizes and presents in summary form conclusions from the past research. See responses to D.J. Schubert and the Fund for Animals in regard to alternatives. It is true that NPS elected not to consider in detail an alternative that would effectively close the park in the winter. Alternatives that evaluated closure of the north, west, and east corridors were considered. We will review the more recent research and update the discussion in the FSEIS as needed.

COMMENTS:

At issue is the system of roads presently in use for winter access. Certain road segments appear to serve as energy-efficient travel linkages between places bison want to be, thus shifting the relationships of winter energetics for this species. The report I supplied (Taper et al, 2000) is the first computer analysis of the data from aerial surveys spanning 1970-1997. The changes over time bear directly on the distribution and numbers of bison, and perhaps even on their presence. If the system of roads presently in use for winter recreation remains unchanged, the future for bison looks bleak.

Given the documentation of distribution changes, wild bison are disappearing as a wintering population from the Pelican country. This is the first spring in centuries that there have not been over-wintering bison cows with new calves in Pelican Valley. Though they have historically been doing this, based on archeological data, they now leave the area to maintain social bonds. Changes likely will continue in the rest of the population as well, because bison will move if possible to maintain social bonds.

A strong case can be made also for attendant habitat degradation. Not only did numbers double by 1994, but the relative distributions changed enormously, and continued data analyses documented significant changes in bison habitat use. There are and likely will continue to be long-term effects on both flora and fauna, including effects on the food sources for grizzly bears and wolves. Further, an ecosystem me change inevitably will involve aspects presently unknown.

RESPONSE:

We will review the more recent research and update the discussion in the FSEIS as needed, duly citing the work.

COMMENT:

Because the changes in the ecosystem focus on bison, the attendant major changes in distribution and numbers have done much to add to the level of conflict outside the park, the reason for the bison EIS. The separation between the two EIS efforts, the lack of communication, and the determination to ignore the long-term ecological data seem unfortunate, especially for the bison.

LETTER 23. DR. MARY MEAGHER, ANIMAL ECOLOGIST, GARDINER MT

RESPONSE:

No response necessary.

LETTER 24. ALVIN J. NELSON, JR. M.S. UNIVERSITY OF IDAHO

COMMENT:

It would be ill-advised to accept any numbers in the FEIS that were generated by computational models, with no confidence intervals or other uncertainty measures, no validation information and no sensitivity information, as being valid for the kinds of determinations being made. The letter contains specific comments regarding all models used in the analysis.

RESPONSE:

NPS acknowledges that there is insufficient site-specific data for all resources and activities of concern everywhere in the three park units. There is likely never to be sufficient data to cover every analytical contingency or alternative parameter that might be envisioned. This is more often true than not for broad programmatic analyses dealing with an entire park unit. NEPA recognizes and allows for incomplete or unavailable data by virtue of 40 CFR 1502.22. It states that data necessary to reasonably foreseeable impacts shall be collected if the cost is not exorbitant. However, if the cost is exorbitant or the means for obtaining it are unknown, the agency is allowed to evaluate reasonably foreseeable significant adverse impacts using theoretical approaches, or research methods generally accepted in the scientific community. The use of models in this analysis, being suitably documented, is therefore acceptable under NEPA. Discussion of specific models noted in the comment letter follows.

COMMENT:

Use of the NONROAD model does not accurately estimate off-road emissions.

RESPONSE:

The NONROAD model was not used directly to estimate emissions in the DSEIS, rather, certain parameters, such as emission factors, were obtained from the model data files. Moreover, most concerns over the accuracy of the NONROAD model are likely more related to shortcomings in activity data, such as population or hours of use. Nonetheless, because of the revisions to the emission estimation methodology, the FSEIS relies very little on data taken from NONROAD data files, and not at all on any NONROAD modeling results.

COMMENT:

The PART5 model is inadequate for supporting the new PM ambient air quality standards and does not provide an accurate inventory of emissions.

LETTER 24. ALVIN J. NELSON, JR. M.S. UNIVERSITY OF IDAHO
<p>RESPONSE:</p> <p>The PARTS 5 model represents the most reliable method for obtaining exhaust and evaporative emission factors for mobile sources. It has been used throughout the EIS process to establish emission estimates for wheeled factors. While we concur that there are uncertainties in the modeling output, we believe that PART5 currently provides the best available data. Moreover, the commenter has failed to suggest a superior means for estimating particulate matter emissions.</p>
<p>COMMENT:</p> <p>MOBILE model validation and evaluation have not been addressed adequately by EPA. At present the understanding and quantification of the uncertainties in MOBILE are inadequate.</p>
<p>RESPONSE:</p> <p>The MOBILE model represents the most reliable method for obtaining exhaust and evaporative emission factors for mobile sources. It has been used throughout the EIS process to establish emission estimates for wheeled vehicles. While we concur that there are uncertainties in the modeling output, we believe that MOBILE currently provides the best available data. Moreover, the commenter has failed to suggest a superior means for estimating mobile source emissions.</p>
<p>COMMENT:</p> <p>IMPLAN: I was unable to locate information about the validation, verification, or sensitivity assessments of the model. This information should have been provided when the SEIS was made available for comment.</p>
<p>RESPONSE:</p> <p>The IMPLAN model has for some time been the standard for analysis of economic impacts by professionals in the field. For example, it is the required model for analysis of economic impacts in National Forest Management Planning. The FEIS correctly describes the model as a regional input-output methodology, and cites the Minnesota IMPLAN Group, 1996.</p>
<p>COMMENT:</p> <p>Use of computational models that are known to be deficient in their representation of physical phenomena without providing information on model limitations is difficult to pass off as unbiased, competent and scientific.</p>

LETTER 24. ALVIN J. NELSON, JR. M.S. UNIVERSITY OF IDAHO

RESPONSE:

The NPS is fully aware of the shortcomings of computational models. However, the SEIS process is not the forum to address these concerns, and these models continue to provide the best available means of estimating emissions and predicting air quality impacts. Information regarding model validation, evaluation, uncertainties or sensitivities is beyond the scope of the SEIS. See response to comment 1, above. With the numerous criticisms (in this comment) of the analysis regarding science, in effect making the methodology the issue, we also refer to CEQ regulations at 40 CFR 1502.24 - Methodology and scientific accuracy. This is the source of the DSEIS quote referred to in the comment as window dressing. EISs are not to be voluminous and encyclopedic. They are to make liberal use of “incorporation by reference” and brief discussion of issues other than significant ones. In that context, agencies are to insure the professional integrity, including scientific integrity, of the discussion and analyses in the documents. Methods are to be identified and there shall be explicit reference by footnote to the scientific and other sources relied upon for conclusions. Considering the requirements of brevity, the tools of incorporation by reference and tiering, the allowance for incomplete or unavailable information, and the method/source disclosure requirement, NPS is fully compliant with the regulation in this document. Though a NEPA document must have scientific integrity, it is not subject to the rigorous rules of scientific publication. If NPS has used a methodology to which there is some objection – it is incumbent upon the commenter to provide evidence of a better method.

**LETTER 25. ETHAN SCHOOLMAN
POLITICS DEPARTMENT AT PRINCETON UNIVERSITY**

COMMENT:

The writer favors SEIS alternative 1b, focusing mainly on the impact of snowmobiles on wildlife. Given the importance of wildlife in the constellation of YNP’s natural resources, as something essential both to most people’s enjoyment of the park and to the functioning of the park’s ecosystem as a whole, the impact of winter recreation on wildlife should not be overlooked. There are 3 main aspects of the issue to look at.

COMMENT:

Is the NPS obligated to take the health and interest of wildlife into account when formulating a winter use plan? Given the disproportionate attention in the impact statement to what are essentially various aspects of the human visitor’s experience, it is important to get clear on how wildlife matters in the winter use plan.

- NPS has the authority to protect wildlife from harm under the Organic Act of 1916, supported by the General Authorities Act of 1978, executive orders, and inter-agency directives such as those dealing with impairment or its prevention.
- Since visitor enjoyment is also an important part of the NPS mandate, and can be seen to overlap with the preservation mandate, looking after wildlife interests is all the more vital. A majority of those surveyed on the issues express a willingness to endure major policy changes in order to protect wildlife.
- It appears that NPS has both the authority and the specific reasons, in the case of Yellowstone, to take the interests of wildlife into account when formulating winter use policy.

<p align="center">LETTER 25. ETHAN SCHOOLMAN POLITICS DEPARTMENT AT PRINCETON UNIVERSITY</p>
<p>RESPONSE: NPS agrees with the commenter's analysis and conclusion.</p>
<p>COMMENT: Does winter use, particularly snowmobiles, in fact impact the health and interests of park wildlife? While the impact of snowmobiles on animal populations may be ambiguous, the impact on individuals is not. The EIS demonstrates that, in regard to mortality and injury from collision, harassment and displacement, stress and energy costs, clearly there are impacts on individuals while the total impact on populations may be unknown. Even if the Yellowstone elk population as a whole is not at risk, it seems clear that the effects of snowmobiles are likely to cause the suffering and death of at least some elk, not to mention bison and other wildlife, every winter. How much death, injury, displacement, stress and energy loss should the public and the NPS be willing to tolerate? In my view, not much in light of the NPS mandate and authority. It is not the mission of NPS to determine the maximum amount of stress and harassment that a winter population can tolerate and to allow recreation up to that point. Rather, it is to encourage knowledge about and respect for the natural environment. Industry points out that snowmobiles are not apparently causing a decline in populations of elk and bison, but NPS, in order to regulate park use, does not have to show that snowmobiles are causing irreversible damage to the park ecosystem. NPS need only show that snowmobiles are causing significantly more damage, harassment and stress to animals than is necessary.</p>
<p>RESPONSE: NPS agrees with the commenter's conclusion.</p>
<p>COMMENT: Given conclusions from the first two questions, which of the four alternatives in the SEIS is preferable? In fact, there is a good way both to minimize harm to wildlife and to ensure continued enjoyment of the park for ourselves and for future generations. That way is Alternative 1b of the SEIS, which represents a more gradual phase-in of the original decision. The disturbance that has been demonstrated, though apparently not population-threatening, is certainly disruptive enough to merit non-tolerance so long as less intrusive ways of enjoying the park remain available.</p>
<p>RESPONSE: NPS agrees with the commenter's conclusion, in the same sense that alternative 1a would be the environmentally preferred alternative.</p>
<p>COMMENT: Narrowly interpreted, the Organic Act directive to conserve resources including wildlife could simply mean to keep populations from declining. However, the spirit of the law is much closer to the statement made by A. Leopold in a report to the Secretary of Interior in 1963 that "a national park should represent a vignette of America." Snowmobiles are not primitive and YNP wildlife deserve better.</p>

**LETTER 25. ETHAN SCHOOLMAN
POLITICS DEPARTMENT AT PRINCETON UNIVERSITY**

RESPONSE:

No response necessary.

**LETTER 26. DAVID WILCOVE, PH.D, AND 17 OTHER WILDLIFE EXPERTS
LARGELY FROM UNIVERSITIES**

COMMENT:

The core NPS mission is to maintain the parks in an unimpaired condition and to prevent uses that derogate the values and purposes of the parks. Executive Orders 11644 and 11989 additionally protect parks from damage caused by off-road vehicles. The Winter Use EIS was the product of over ten years of analysis and substantial public involvement. The conclusions drawn in the EIS and ROD were based on substantial, credible, and the best available scientific evidence documenting the adverse impact of snowmobiles on wildlife, air quality, natural quiet, and other park values. Based on the scientific evidence, it is our professional opinion that snowmobiling results in significant direct, indirect, and cumulative impacts on wildlife, their behavior and environment. Impacts to wildlife include harassment, displacement from critical habitats, disruption of feeding activities, alteration in habitat use, and depletion of critical energy supplies.

RESPONSE:

No response necessary.

Organizations Generally Favoring Use of Snowmobiles in the Parks (16 Letters)

**LETTER 27. AMERICAN COUNCIL OF SNOWMOBILE ASSOCIATIONS, INC
THE WRITER IS THE EXECUTIVE DIRECTOR OF THE ORGANIZATION**

COMMENT:

It is our understanding that there are a total of 65,000 snowmobiles that enter the parks on an annual basis and 30,000 autos, buses, and RVs on a daily basis. To unilaterally ban the smallest visitor group makes little or no sense if the concerns are truly threats to wildlife and/or the environment. Snowmobile access is already very restricted. It is mind-boggling to think that "The People's Park" is actually being turned into "Wilderness" which will eventually allow no entrance to the first and one of the most fascinating national parks.

RESPONSE:

The statement ignores the high significance of impacts produced by a small percentage of vehicles, relative to impacts from other vehicle types during other seasons. NPS has not banned winter access to the parks.

**LETTER 27. AMERICAN COUNCIL OF SNOWMOBILE ASSOCIATIONS, INC
THE WRITER IS THE EXECUTIVE DIRECTOR OF THE ORGANIZATION**

COMMENT:

We are hopeful that you will use the results of the scientific studies that were completed recently. We continue to support strict enforcement of reasonable speed limits, entrance limits, and adaptive management techniques.

RESPONSE:

NPS will use or display or cite relevant and credible data, subject to the time allotted for this process.

**LETTER 28. BIG HORN MOUNTAIN COUNTRY COALITION
THE WRITER IS THE EXECUTIVE DIRECTOR**

COMMENT:

We want visitors to have a wide range of winter recreation opportunities. Alternative 2 provides for reservation system, which should help for high use peak days. The EPA is the expert and should be the agency that establishes emissions standards for snowmobiles. We support a reasonable level at which to regulate the sound of snowmobiles, established by the appropriate federal agency. Social and economic issues and natural resources should be monitored. Impacts of winter use must not degrade natural resources.

RESPONSE:

EPA has endorsed snowcoach-only access as the least environmentally damaging means for winter recreation access to the parks, based on a thorough and complete scientific review. The establishment of emission standards, as applied to average vehicle fleets performance, will be for the industry as a whole. In the EPA rule making process, industry has been arguing for the least possible restriction in terms of allowable emissions. NPS is concerned that the result of the final rule and its phased implementation (2006 and 2010) will not result in machines that are adequate to reduce emissions (and sound) in national parks. EPA notes that not all machines produced after 2006 and 2010 will meet a “cleaner and quieter” standard, due to fleet averaging. There is not likely to be a labeling requirement in the rule to allow easy identification of machines that will meet the standard, whatever that standard becomes. Alternative 3 allows NPS, under its own authority and jurisdiction, to regulate the types of machines that may come into the parks irrespective of the industry- governing EPA. NPS wishes to encourage continual improvement in snowmobiles regarding emissions, sound, safety, and visitor convenience. If industry does not continue to produce cleaner and quieter machines, or does not continue to improve over time, NPS would have the authority not to allow continued snowmobile access or to appropriately reduce their numbers.

LETTER 29. BLUE RIBBON COALITION, INC
THE WRITERS ARE THE BRC PUBLIC LANDS DIRECTOR AND PRESIDENT

COMMENT:

The expectation that ambient sounds within a developed zone should move toward a wilderness-like condition is not appropriate. Human caused sounds are expected in developed zones.

RESPONSE:

The zone management prescriptions do not replicate wilderness characteristics. Human-caused sound is expected within such areas. However, since even development zones are inside national parks it is reasonable to manage them so they are as quiet as possible given the level of development and use. It should be clear, as disclosed in the FEIS and SEIS that noise generated in the development zones and travel corridors affect other management zones where natural conditions of sound are expected.

COMMENT:

The discussion of air quality should state that EPA standards have never been violated by the current level of activity. Sound levels of snowcoaches that are only conceptual are unrealistic, since they are not even under development.

RESPONSE:

The discussion of air quality is clear in this regard. Modeled violations are used routinely by state and federal agencies in their regulatory duties. In this instance, modeled violations represent conditions to avoid by selecting appropriate measures in the eventual decision.

COMMENT:

Snowmobile visitation numbers have not increased appreciably since 1990. The numbers used include traffic on Hwy. 191 between Big Sky and Bozeman.

RESPONSE:

Visitation is a function of many things: snow quality in the parks, snow quality elsewhere, etc. General economic circumstances dictate whether or not people travel or vacation and how long they stay, or prioritize their spending in other ways. Snowmobile use increased appreciably as gateway service providers and others noted that people should use their "last chance" to visit the parks in the winter. Traffic on highway 191 is not part of the modeled scenarios that form the basis for the alternatives. As in use on U.S. 212 to Cooke City, or Highways 191 or 287 in GTNP, through-traffic vehicular use is viewed as a "given," unrelated to specific recreation related use.

COMMENT:

Snowcoaches that are under development are speculative and insufficient for analysis purposes. There is no discussion that the interior of current snowcoaches is so noisy that visitors must wear ear plugs.

<p align="center">LETTER 29. BLUE RIBBON COALITION, INC THE WRITERS ARE THE BRC PUBLIC LANDS DIRECTOR AND PRESIDENT</p>
<p>RESPONSE:</p> <p>Two years ago, new cleaner and quieter snowmobiles were a matter of speculation. During the FEIS process, NPS was continually told by industry and other advocates that making changes in machines, as proposed in several alternatives, was not possible. Further, NPS believes that, without the use of helmets, snowmobile users would find the sound unbearable and damaging. The bottom line is that all oversnow machines must be improved.</p>
<p>COMMENT:</p> <p>Because the DSEIS economic impacts exceed \$100,000, any decision must undergo appropriate congressional review and comply with the Regulatory Flexibility Act and the Small Business Enforcement Fairness Act.</p>
<p>RESPONSE:</p> <p>Even allowing that exceeding the economic impact trigger can be demonstrated, there is nothing in NEPA that requires a decision to be limited on that basis. If the trigger level is exceeded, then a “reg-flex” analysis must be completed as part of the preparation of the rule. If the trigger is not exceeded, then there is no need for the analysis as part of rule making. In either case, a NEPA document and decision may be made without such an analysis. The final rule presently in force is not a major rule under 5 U.S.C. 804(2), the Small Business Regulatory Enforcement Fairness Act. It does not have an annual effect on the economy of \$100 million or more. From the FEIS, estimated economic loss and employment impacts of implementing actions under the rule are: in the five-county area, an estimated loss of \$14.4 to \$19.2 million; in the 3-state area surrounding the parks, a possible loss of \$7.7 million to a possible increase of \$7.0 million. Increased winter visitation from new visitors to the parks who are more likely to visit under circumstances afforded by snowcoach-only access, could substantially offset the estimated loss and employment reductions from a reduction in visitation by current winter visitors.</p>
<p>COMMENT:</p> <p>Visitors simply viewing wildlife are not harassing it.</p>
<p>RESPONSE:</p> <p>Harassment, disturbance or stress is related to the distance from which observation takes place, the time of the year, the species being observed, other stressors that may present at the same time, or the level of stress that concurrently exists in the animal(s) being observed.</p>
<p>COMMENT:</p> <p>Snowplanes should be allowed on Jackson Lake; they are traditional vehicles, and they are so few that impacts are minimal.</p>
<p>RESPONSE:</p> <p>The use of snowplanes is outside the scope of the SEIS; being predicated solely on analysis of new snowmobile technology the desire for additional public comment. In the FEIS, it was demonstrated that the single greatest contributor to impact on the natural soundscape is the use of snowplanes on Jackson Lake.</p>

LETTER 29. BLUE RIBBON COALITION, INC THE WRITERS ARE THE BRC PUBLIC LANDS DIRECTOR AND PRESIDENT
<p>COMMENT:</p> <p>The president of the Blue Ribbon submitted Dr. Gary A. Bishop's, University of Denver, as an attachment to the Blue Ribbon Coalition's comments. These comments are separately summarized in the technical section of this summary.</p>
<p>RESPONSE:</p> <p>See letter from Dr. Bishop in the Academia section, and NPS responses to it.</p>

LETTER 30. CALIFORNIA-NEVADA SNOWMOBILE AND LETTER 31. UTAH SNOWMOBILE ASSOCIATIONS
<p>COMMENT:</p> <p>(Note: Identical letters were received from these two associations.) We support alternative 2. If there are certain facets of alternative 2 that may need to be adjusted in order to still allow for individual snowmobile access, then alternative 2 should be the baseline.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>We support the following concepts: A reservation system with daily entry limits based on historic daily averages, until a carrying capacity study is complete; EPA should regulate emissions; increase nonmotorized groomed trails; expand educational opportunities; sell park passes in advance.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>We ask the NPS to carefully reexamine the information on snowcoach emissions, air quality, sound and road impact. The NPS should arrive at a decision that circumvents going through a whole analysis process to make minor changes in managing the parks.</p>
<p>RESPONSE:</p> <p>The original purpose of the EIS was to look at alternatives for basic management of the parks during the winter. Such an EIS is termed "programmatic," and it is intended to do as the commenter suggests — to make major changes in management and provide "programmatic" direction implementing such changes. The SEIS departs somewhat from this by getting well into implementation measures that tend to reduce flexibility. The purpose of adaptive management and monitoring, as part of the decision (including the existing decision), is to allow the agency to use a pre-determined process that has been reviewed by the public for making future management changes. A comprehensive evaluation of options available for assuming emission factor inputs has been accomplished. The results are to be reflected in air quality modeling for both snowcoaches and snowmobiles.</p>

**LETTER 30. CALIFORNIA-NEVADA SNOWMOBILE AND
LETTER 31. UTAH SNOWMOBILE ASSOCIATIONS**

COMMENT:

We have concerns that snowcoach emissions have been understated. Snowcoach emissions are nearly six times higher than CO emissions from the new generation snowmobiles. The FEIS understates CO emissions from snowcoaches by a factor of nearly 50%. It's a myth that snowcoaches would improve air quality because they carry more passengers. The NPS has erroneously determined the 4-track conversion vans to be "BAT," and these vans are damaging to groomed snow roads. The 4 track conversion vans and the Bombardier snowcoach produced sound levels ranging from 78.4 dBA to 73.0, not 70 and 75 dBA as the SEIS reported. 4-track conversion vans cut 18 inch wide and 18 inch deep ruts in groomed snow surfaces after only seven passes.

RESPONSE:

This comment is the result of misinformation. Snowcoach emissions may instead be overstated. The analysis thus far has encouraged the use of factors that liberally estimate impacts due to snowcoaches, and conservatively estimate the impacts of snowmobiles. That is, "best available technology" (BAT) is used for snowmobiles but not for snowcoaches. NPS, by necessity due to time allotted for this process and lack of field-specific data, used factors that were most representative of the current snowcoach fleet – these being liberal in terms of impacts. A comprehensive evaluation of options available for assuming emission factor inputs has been accomplished to support the FSEIS analysis. The results are to be reflected in air quality modeling for both snowcoaches and snowmobiles. The use of Mattracks® is not set in concrete as the best available technology, but the machines do improve some performance factors over existing machines such as some of the old Bombardiers. Hence they are viewed as part of the solution. The FSEIS will attempt to balance the view of snowmobiles and snowcoaches in terms of BAT.

The reported damage due to Mattracks® use is a view advanced by the State of Wyoming in its comments, as a result of a joint field measurement lab that took place during warm temperatures at the end of last season. It may be appropriate to note that snowmobiles similarly damage groomed surfaces, depending upon the temperature, the amount of use, the power of the machine, and driver performance. Regarding air quality, the single-most relevant factor in reducing impacts on air quality, parkwide, is to reduce the number of machines. For example, if visitation were held constant, and all snowmobiles carried two people instead of one, pollution would effectively be cut in half. Similarly, if a snowcoach and snowmobile produced the same emissions, replacing 6 to 15 snowmobiles by a snowcoach would reduce pollution by a factor of 6 to 15.

COMMENT:

There have never been any violation of ambient air quality standards in Yellowstone. "Filters" worn by park employees do not provide protection from carbon monoxide. Snowmobiles emit extremely low levels of nitrous oxide and do not cause smog.

**LETTER 30. CALIFORNIA-NEVADA SNOWMOBILE AND
LETTER 31. UTAH SNOWMOBILE ASSOCIATIONS**

RESPONSE:

NAAQS standards are set at levels needed to avoid respiratory problems in old, young or other susceptible individuals. The fact that such standards may have never been violated does not mean that unacceptable levels of pollution are not occurring. NPS believes that pollution is unacceptable if it routinely is at a level just below the standard. Air quality in National Parks, or Class 1 airsheds, is required by law to be the best it can possibly be. NPS has disclosed, by alternative, the amount of pollution generated by snowmobiles and snowcoaches. Regarding this issue, snowcoach-only transport, alternatives 1a and 1b, would produce the least amount of pollution overall despite the modeling in these alternatives of the existing “non-BAT” snowcoaches. Respirators were worn by park personnel because of the need to work in conditions created by the emissions of snowmobiles through the West Gate.

**LETTER 32. CITIZENS FOR A USER FRIENDLY FOREST:
“RED MEAT, BOARD FEET, DIG DEEP, DRIVE JEEP”
THE WRITER IS THE PRESIDENT OF THE ORGANIZATION**

COMMENT:

How “clean” does clean air have to be to meet the fundamental purpose of the park? It is unavoidable that some impairment of air quality will result. Present data related to CO and PM₁₀ pollutant levels for alternative 1a and 2; both alternatives meet the national and Montana standards.

RESPONSE:

Air quality in national parks, or Class 1 airsheds, is required by under the Clean Air Act to be the best it can possibly be. See previous letter, response to comment 5.

COMMENT:

Snowcoaches are more audible than snowmobiles.

RESPONSE:

This comment ignores the equity that should be accorded to snowcoaches in the use of best available technology for this analysis. See previous letter. On a one-to-one basis, existing snowcoaches and snowmobiles produce different kinds of sound in terms of audibility and frequency. 2-stroke snowmobiles produce sound characteristics that for most unprotected ears are interpreted as “louder” than snowcoaches. New generations of snowcoaches and snowmobiles have yet to be fully evaluated in terms of sound characteristics, but it is known that both can be quieter than they are at present. Reviewing the overall levels of sound produced in the alternative scenarios, alternatives 1a and 1b have the least impact in terms of acres in which oversnow vehicles (snowcoaches in this case) are audible.

COMMENT:

The scientific evidence supporting the negative effects of snowmobile use on big game is weak and theoretical and cannot be confirmed at this time.

RESPONSE:

This is not the case. There is strong scientific evidence, over a long period of study, that snowmobiles do impact wildlife. Snowmobile use can displace animals, harass animals, produce elevated levels of stress, cause excessive energy use, and cause direct and indirect mortality. These are all adverse impacts. NPS has indicated that these documented and incontrovertible impacts on wildlife have not yet been shown to result – in Yellowstone – in reduced populations or other population-level impacts. Such impacts have been theorized and predicted if existing use (along with maintaining all groomed surfaces) is continued (see Dr. Mary Meagher). Even though population-level impacts have not yet been shown or agreed upon, there is no information that can support the position that there are none – especially if use is allowed to continue and grow.

COMMENT:

Alternative 1a will eliminate the most popular form of winter experience and will therefore have a major adverse effect on visitor experience. The Grassy Lake Road should remain open to snowmobile use as there are no wildlife issues there to support a ban.

RESPONSE:

This popular form of winter experience is available around the GYA outside all gateway areas and elsewhere. It is not unique to Yellowstone and Grand Teton National Parks. Alternatives 1a and 1b allow people to travel in the parks for sightseeing, wildlife viewing, access to solitude and quiet, and enjoyment of other winter recreation pursuits. Quality visitor experiences unique to these parks would be available to those who are seeking them. “Better,” less restricted snowmobile experiences can be had on adjacent national forests. The ban on snowmobiles in the three parks results from a finding of impairment associated with numerous types of impacts acting cumulatively on the environment. Closure of Grassy Lake Road is not a function only of impacts on wildlife.

LETTER 33. CODY CHAMBER OF COMMERCE

COMMENT:

The Cody Chamber of Commerce supports Alternative 2 and rejects Alternatives 1a, 1b, and 3.

RESPONSE:

No response necessary.

COMMENT:

In Alternatives 1a and 1b, East Gate traffic would be denied winter access to Yellowstone due to the inability of the current snowcoaches to navigate Sylvan Pass on a routine basis. Among the reasons for this is that snowcoaches are wider than snowmobiles, hence special grooming and plowing is required so that they can safely meet and pass oncoming traffic. Also, a snowcoach is not built to accommodate the transverse slopes often generated by drifting snow. Because Sylvan Pass must be plowed and groomed on a routine basis to provide for snowcoaches, it would necessitate a groomer/plow to be stationed at the East Gate of Yellowstone National Park. No efforts to remedy this problem were mentioned in the draft SEIS.

LETTER 33. CODY CHAMBER OF COMMERCE

RESPONSE:

The purpose for preparing this SEIS is to evaluate the impact/benefit of new snowmobile technology. The issue of snowcoach use over Sylvan Pass does not fit into this analysis need. We note, however, that the current decision states that all existing oversnow groomed routes will remain, and that snowcoach services will be offered on the East Entrance road if safety goals can be met. Avalanche management on Sylvan Pass may mean unscheduled closures of the road to all travel. This feature is shown as an implementation strategy on page 38 of the DSEIS, and as an action specific to YNP for alternative 1a on page 39

COMMENT:

No effort has been shown on the part of Yellowstone National Park or the National Park Service to mitigate the economic loss mentioned in the document *Economic Importance of the Winter Season to Park County, Wyoming*. The impact on winter tourism in Cody and Park County, Wyoming, would continue indefinitely. Cody Chamber of Commerce challenges the statement in Table 10 of the draft SEIS that other than in West Yellowstone there would be “No measurable impact on other gateway communities.” Provide this economic impact document with the Final Supplemental EIS and consider the economic losses in your decision.

RESPONSE:

NPS reviewed the referenced paper and disagrees with some of the key conclusions that are represented therein, like the determination of economic loss. NPS’ review is documented, and as such is located in the planning record. For a variety of reasons, NPS decided not to provide detailed reviews and criticisms of this and other reports in the DSEIS itself. The conclusions about the report are reflected in DSEIS Table 15, page 86. In the FSEIS, there is further discussion and analysis of impacts at the community level. Mitigation of economic impacts is provided in the form of alternatives 2 and 3 in the DSEIS, at a cost to environmental quality in the parks

COMMENT:

Alternative 3 is better than Alternatives 1a and 1b, but is still unacceptable as presented. The number of snowmobiles allowed through the East Gate of Yellowstone National Park is too restrictive and the tour guide system is questionable. There is no mention of who could be a tour guide or what the limitations would be placed on travel. There is no freedom for visitors to travel at their own pace. Allowing only snowcoaches, skiers and snowshoers after Presidents’ Day and the daily limit of 100 snowmobiles would cause economic harm to Cody and Park County, Wyoming.

RESPONSE:

Alternative 3 provides for a maximum daily limit that is considerable higher than the average daily use. The average peak day use at the East Entrance is 65 snowmobiles, and the average daily is about 37. Alternative 3 allows a maximum daily use of 100. NPS does not believe that Cody’s economy would be harmed by allowing use that is 30% greater than the average peak use experienced to date. Other criticisms: snow quality and avalanche conditions are highly questionable at the East Entrance after Presidents Day. NPS believes that use is at most incidental after this time during average years. Concerns about details of implementation relative to guides are not sufficient to invalidate the notion that “guided tours only” is a viable solution to many issues.

LETTER 33. CODY CHAMBER OF COMMERCE
<p>COMMENT:</p> <p>Cody Chamber of Commerce fails to see the justification for the proposed limitation on snowmobiles on the basis of air pollution. Table 10 in the draft SEIS and modeling for Flagg Ranch, West Yellowstone and West Entrance to Madison shows air quality levels below those set forth by the National Ambient Air Quality Standards that apply in Wyoming, or the Montana Ambient Air Quality Standards. The document by Cain and Coefield of the Monitoring and Data Management Bureau, Planning, Prevention and Assistance Division, Montana Department of Environmental Quality reports that 345 snowmobiles per hour could go through the West Entrance and not exceed the MAAQS based on their pollution model. Proposing major changes to snowmobile uses in all of Yellowstone National Park, as opposed to site-specific solutions, and other areas covered in the draft SEIS does not appear to meet the requirements of NEPA as required by NPS regulations.</p>
<p>RESPONSE:</p> <p>The limitation is justified as a way to allow snowmobiles into the parks. The existing level of use, and the emissions caused by snowmobiles - among other impacts - must be mitigated to address the impairment of park resources and values. Air quality in the parks is, by law, to be as clean as it can be not as clean as snowmobiles allow it to be. To manage uses so that they barely meet national or state standard, predicated on the level at which susceptible individuals are affected, is not acceptable in the light of Clean Air Act requirements nor NPS mandates and policies. NPS has since the beginning informed Cooperating Agencies and the public that the winter use planning effort is a broad, programmatic approach covering three park units. As such it is not, and cannot be, site-specific. There is no requirement in NEPA that calls for site-specific EISs to address parkwide issues; rather the opposite is true.</p>
<p>COMMENT:</p> <p>Restrictions are being considered when a winter carrying capacity is not already in place. Cody Chamber of Commerce described concerns about what a carrying capacity visitor survey should ask.</p>
<p>RESPONSE:</p> <p>A carrying capacity analysis is not necessary as a prerequisite to applying restrictions. The existence of adverse impacts, and in this case a finding of impairment, requires NPS action to remove the source of impact or otherwise mitigate the impact. Some form of restriction or management change would have to be implemented.</p>
<p>COMMENT:</p> <p>Regarding the section in the draft SEIS on noise and sound, it is presumed that the limits shown in Tables 10 and 11 are only the results of modeling and not recommended enforcement guidelines at this time.</p>
<p>RESPONSE:</p> <p>Table 10 is a summary of effects that were calculated by modeling alternative travel scenarios (numbers and locations of oversnow vehicles) using noise/sound characteristics of the appropriate vehicle types (see assumptions). There is no limit conveyed by this information. Table 11 recommends appropriate standards for each alternative that would trigger additional management action – based on measurable results for sound indicators. Measurement would be by field monitoring (audibility logging), not by modeled data.</p>

LETTER 33. CODY CHAMBER OF COMMERCE

COMMENT:

Alternative 2 will cause the least economic impact on Cody and Park County, Wyoming. Adaptive management techniques are expected to allow increased winter traffic through the East Gate as snowmobiles become cleaner and quieter in the years to come.

RESPONSE:

See response to comment 4, above. NPS believes one difference between alternatives 2 and 3 is the amount of growth to be allowed in snowmobile use. Alternative 3 allows a growth in average daily use of about 67%, and growth in peak use of about 33%. This allowable growth cannot be described as an adverse impact on Cody. Alternative 2 would allow more growth, but it is questionable that the infrastructure at Pahaska (or the resources on the Shoshone National Forest) can accommodate such growth. On the other hand, even if alternatives 1a and 1b would likely cause Pahaska Tepee to market its winter season differently, NPS believes there will be no significant economic impact on either Cody or Park County.

**LETTER 34. ILLINOIS ASSOCIATION OF SNOWMOBILE CLUBS, INC.
THE WRITER IS THE PRESIDENT OF THE ORGANIZATION**

COMMENT:

I would hope that you take into account the economic issues raised during Congressman Don Manzullo's hearing in West Yellowstone on Jan. 26, 2002. The IASC believes the newer technology snowmobiles are clean and efficient. We believe the report from the Denver EPA office falls under the "junk science" heading. The IASC supports reasonable restrictions, including speed limits, strict enforcement, and adaptive management.

RESPONSE:

Economic issues are considered in the FEIS/ROD and in the DSEIS. Economic impacts are evaluated and disclosed in all EIS documents. There has been much disagreement about the significance of the economic impacts and how the decision maker factors them into the decision. The EPA is a Cooperating Agency whose mandated duties include review and evaluation of environmental impact statements. NPS does not understand the commenter's reference to "junk science" in EPA's review. NPS cannot respond to a generic notion of "reasonable" restrictions. Restrictions are, or should be, responsive to the need to mitigate or eliminate impacts caused by human use so that park resources and values are unimpaired for current and future generations. When there is doubt, park managers are to err on the side of protection. Any measure shown to protect resources and values, or regulating use types and levels consistent with those values, is by definition "reasonable."

<p align="center">LETTER 35. MINNESOTA UNITED SNOWMOBILERS ASSOCIATION THE WRITER IS THE VICE-PRESIDENT OF THE ORGANIZATION</p>
<p>COMMENT:</p> <p>We support the concepts in Alternative 2, including: a reservation system and interim daily entry limits, based on historic daily averages, until a carrying capacity study is complete; EPA should regulate emissions; increase nonmotorized groomed trails; expand educational opportunities; sell park passes in advance.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>We have concerns the emissions of snowcoaches have been understated. Snowcoach emissions are nearly six times higher than CO emissions from the new generation snowmobiles. The FEIS understates CO emissions from snowcoaches by a factor of nearly 50%. It's a myth that snowcoaches would improve air quality because they carry more passengers. The NPS has erroneously determined the 4-track conversion vans to be "BAT," and these vans are damaging to groomed snow roads. The 4 track conversion vans and the Bombardier snowcoach produced sound levels ranging from 78.4 dBA to 73.0, not 70 and 75 dBA as the SEIS reported. Additionally, 4-track conversion vans cut 18 inch wide and 18 inch deep ruts in groomed snow surfaces after only seven passes.</p>
<p>RESPONSE:</p> <p>This comment, repeated throughout the body of comments in favor of snowmobiling, is the result of misinformation. Snowcoach emissions may in fact be <u>overstated</u>. The analysis thus far has encouraged the use of factors that liberally estimate impacts due to snowcoaches, and conservatively estimate the impacts of snowmobiles. That is, "best available technology" (BAT) is used for snowmobiles but not for snowcoaches. NPS, by necessity due to time allotted for this process and lack of field-specific data, used factors that were most representative of the current snowcoach fleet – these being liberal in terms of impacts. A comprehensive evaluation of options available for assuming emission factor inputs has been accomplished. The results are to be reflected in air quality modeling for both snowcoaches and snowmobiles. The use of Mattracks® is not set in concrete as the best available technology, but the machines do improve some performance factors over existing machines such as some of the old Bombardiers. Hence they are viewed as part of the solution. The FSEIS will attempt to balance the view of snowmobiles and snowcoaches in terms of BAT. The reported damage due to Mattracks® use is a view presented by the State of Wyoming in its comments, as a result of a joint field measurement lab that took place during warm temperatures at the end of last season. It may be appropriate to note that snowmobiles similarly damage groomed surfaces, depending upon the temperature, the amount of use, the power of the machine, and driver performance. Regarding air quality, the single-most relevant factor in reducing impacts on air quality, parkwide, is to reduce the number of machines. For example, if visitation were held constant, and all snowmobiles carried two people instead of one, total pollution from snowmobiles would effectively be cut in half. Similarly, if a snowcoach and snowmobile produced the same emissions, replacing 6 to 15 snowmobiles by a snowcoach would reduce pollution by a factor of 6 to 15. Such an estimate would be conservative, as snowcoaches generally do not appear to produce emissions as high as 2-stroke snowmobiles.</p>

LETTER 36. MONTANA TOURISM COALITION

COMMENT:

The Montana Tourism Coalition opposes the ban and supports Alternative 2. The coalition supports freedom of access by multiple user groups. Yellowstone was created as a “public park or pleasuring-ground for the benefit and enjoyment of the people,” which is prevented by a ban. This organization is also concerned about the economic impact to gateway communities, which have been and are willing to work towards a consensus on this issue.

RESPONSE:

When it has been found that a park use, such as a form of recreation, impairs resources and values of the park that are intended for enjoyment of present and future generations, NPS must act to eliminate the source of impairment. Such a finding was made in November 2000 in relation to snowmobile use. Use by ORVs, including snowmobiles, must be found to be consistent with park resources and values in order to be allowed. The notion of the national park as a playground is constrained first and foremost by the conservation and protection of the park and its resources.

Though community proponents for snowmobiles seem to agree on generalities such as park protection, “reasonable” limitations on snowmobiles, strict enforcement of speed limits, need for “cleaner and quieter” machines, there is very little consensus about what most of those things mean in terms of management. Cooperating Agencies and others who appear to agree in principle, at the same time are strongly opposed to measures that NPS feels are necessary to allow snowmobiles in the parks. Most proposals a “business as usual,” no compromise approach that does not allow NPS to implement measures for ensuring protection of resources.

LETTER 37. MOORE, SMITH, BUXTON AND TURCKE (REPRESENTING BLUERIBBON COALITION, INC., AND MONTANA AND IDAHO SNOWMOBILE ASSOCIATIONS)

COMMENT:

Improvements on the status quo are overdue. Administrative issues such as grooming, permit issuance, and “traffic” rules can all be modified to enhance visitor experience while increasing resource protection. The time has come for reasonable equipment and access restrictions in the parks and many NPS units. Certainly a more aggressive official law enforcement presence is needed, but the agency must also become more open to the opportunities to “partner” with local interests and enthusiast organizations with a stake in proper care for park resources and adherence to regulations. Alternative 2 strikes the best balance to the issues.

RESPONSE:

No response necessary.

COMMENT:

The increasingly vocal “silent majority” supports continued snowmobile access to the parks. Opponents of snowmobile access, including some NPS employees, have persistently mischaracterized the nature of this process and those who support reasonable snowmobile access.

LETTER 37. MOORE, SMITH, BUXTON AND TURCKE (REPRESENTING BLUERIBBON COALITION, INC., AND MONTANA AND IDAHO SNOWMOBILE ASSOCIATIONS)

RESPONSE:

The silent majority is a fiction that anyone can lay claim to. The majority of respondents and commenters throughout this process favor banning snowmobiles. The characterization of NPS employees as biased or as opponents without due rationale is unfair and untrue. On the contrary, NPS employees have worked diligently to be neutral in this process and to perform a defensible NEPA analysis despite comments such as these.

COMMENT:

Wildlife: The DSEIS analysis of wildlife issues turns upon an unprecedented and dangerous interpretation of NPS management direction. Drafters of the DSEIS have determined that existing regulations “prohibit snowmobile use that ‘disturbs’ wildlife” and conclude that “NPS does not have the authority to allow snowmobile use where disturbance occurs.” NPS and Department of Interior Officials should carefully consider the implications of this analysis. This logic leads to gradual elimination of humans from all NPS “ecospheres.” The SEIS definition of disturbance is filled with value-laden terms that are not susceptible to objective research.

RESPONSE:

The source of direction to which the commenter refers is law, executive order, regulation, and policy. Such direction is provided verbatim in the DSEIS. The “drafters” know it is not their responsibility to interpret direction – that is left to the decision maker. The commenter should note that laws and policies contain value-laden terms that guide what decision makers ask for as analysis; NPS must use these terms by necessity. NPS has no intention, overt or covert, to eliminate humans from the parks.

COMMENT:

Air Quality: The DSEIS air quality information is beyond the understanding of most readers, and certainly lawyers. In fact, detailed analysis of air quality issues is logically beyond the technical capacity and legal authority of NPS. We join in, and incorporate by reference, the ISMA comments detailing why the EPA and states are the proper entities to study and regulate air quality issues. Flaws in the air quality analysis include the lack of a meaningful context, comparisons with a “zero impact” baseline, and no discussion of the nature of the “equation” for air quality components. The DSEIS fails to properly explain its methodology or conclusions concerning air quality for the “snowcoach” alternatives. Meaningful data on snowcoach emissions is lacking at this time.

LETTER 37. MOORE, SMITH, BUXTON AND TURCKE (REPRESENTING BLUERIBBON COALITION, INC., AND MONTANA AND IDAHO SNOWMOBILE ASSOCIATIONS)

RESPONSE:

NPS has the authority and jurisdiction to manage uses to protect air quality and air quality related values in the parks. It has an affirmative responsibility under the Clean Air Act. EPA does not manage air resources or land uses in the parks, nor does the state. NPS has the expertise necessary to analyze air quality issues, supplemented as necessary by consultants in the field. Methodologies and assumptions are fully disclosed. A comprehensive evaluation of options available for assuming emission factor inputs has been accomplished. The results are to be reflected in air quality modeling for both snowcoaches and snowmobiles. There is no need under NEPA to fully explain or evaluate the models used, only to make reference to them. Model documentation can be obtained if necessary. NEPA allows the use of models or other theoretical approaches using the best available data and assumptions when a complete database is unavailable. Both the FEIS and the SEIS meet this requirement.

COMMENT:

Visitor Services Issues: Those seeking solitude, “natural quiet” and wilderness experience can find it in the parks and other NPS units. Conversely, the preferences of visitors placing a priority on those attributes should not exclude others from the parks. The Wyoming Survey shows roughly 70% of Wyoming residents oppose a ban on snowmobile access to the parks. One cannot dispute the fact that the snowmobile is the chosen mode of access for the majority of current winter visitors to the parks.

RESPONSE:

The comment suggests that because there are snowmobiles in Yellowstone and Grand Teton, those who desire a quiet experience can always go elsewhere. This is an acknowledgement that other users are not able to find the desired quality experience in these parks because of one user type. Those who access the park via snowmobile are not being excluded by a ban on snowmobiles. Rather, all visitors who wish to experience winter in these parks would have the means to do so via snowcoach under alternatives 1a and 1b. The Wyoming survey has been misinterpreted in the comment; the survey queried registered snowmobile owners in the state, not all residents. The statement should read: 70% of all snowmobile owners in the state oppose a ban. Conversely, it appears that 30% of state snowmobile owners support a ban. Those who support snowmobile use in the parks do not acknowledge the idea that many others would likely use the park if snowmobiles were not allowed, or if they were greatly restricted. They emphasize maintaining the experience and freedom for snowmobilers, but do not recognize that other users have the right to an experience free from the impacts of snowmobiles. NPS wishes to achieve some balance in this context.

COMMENT:

The DSEIS, like the FEIS, provides few practical details about the snowcoach alternatives. Lacking in the DSEIS is any discussion of the feasibility of the “new snowcoach”, its cost, whether existing concessionaires and rental outfitters can realistically purchase, maintain and operate such vehicles, and whether they will be accepted by the public. Snowmobiles are preferred because they allow freedom and flexibility of travel.

LETTER 37. MOORE, SMITH, BUXTON AND TURCKE (REPRESENTING BLUERIBBON COALITION, INC., AND MONTANA AND IDAHO SNOWMOBILE ASSOCIATIONS)

RESPONSE:

The purpose of the SEIS is to evaluate new snowmobile technology. The FEIS provides sufficient detail to support the selection of a programmatic plan allowing snowcoach use only. Details of implementation do not affect the viability of the overall plan. Various measures in the decision relate to improving snowcoaches and working with communities to market a new winter visitor experience and make the plan work.

COMMENT:

Socioeconomic Issues: The DSEIS glosses over the negative socioeconomic impacts associated with elimination of meaningful snowmobile access to the parks. Such shortcomings preclude adequate public disclosure of impacts required by NEPA.

RESPONSE:

The presentation of socioeconomic impacts is straightforward and prominently displayed in both the FEIS and the DSEIS. Recognition and consideration of social and economic impacts is fully discussed in the record of decision.

COMMENT:

Procedural Concerns: The DSEIS violates the standards under 40 CFR 1502.24 regarding the identification of methodologies used and explicit references to the scientific and other sources relied upon for conclusions in the statement. NEPA regulations have been interpreted by courts to require that agencies provide the public with hard data from which agency “experts” derived their opinions. An agency cannot present mere conclusions but must present and discuss sufficient information about technical analyses to support meaningful public input. The FSEIS must assign a larger role to science.

RESPONSE:

All methodologies are suitably referenced in the document to NPS’ knowledge. The commenter uses the wildlife disturbance survey of park employees as an example of the need to provide hard data. There is nothing in the cited regulation that requires an agency to reproduce data sets in an EIS. It states that an agency may place discussion of a methodology in an appendix. All data generated by NPS in this analysis is part of the administrative record. Regarding the wildlife survey, NPS openly explained its methods and discussed the anecdotal nature of the information and therefore cannot be faulted for including illustrative material. There is ample support in the scientific literature – liberally cited in the EIS documents – for the analysis of impacts on wildlife.

LETTER 38. NATIONAL ALLIANCE OF GATEWAY COMMUNITIES

COMMENT:

NAGC supports the new SEIS process and Alternative 2. The national parks have national missions that must remain paramount and that the interests of nearby communities should not override the national interest, but more attention should be paid to the economic impact of each of the alternatives in the SEIS on gateway communities. Strike a balance that maintains the environment and the resources of the national parks for future generations to use and enjoy.

RESPONSE:

Protection and conservation of park resources and values is the paramount mission of NPS. When park uses compromise, or impair, resources and values, the sources of impact must be eliminated. It is to be hoped that economic interests can be balanced with the protection of the parks, not the reverse. Economic impacts have been evaluated and considered throughout this process.

COMMENT:

The use of better management and enforcement techniques by Park staff and the advent of cleaner, quieter snowmobiles will mitigate any negative impact that may occur. The pilot program produced very encouraging results.

RESPONSE:

These measures are clearly part of a total solution. However, they will not address all impacts of snowmobile use in the parks.

COMMENT:

It is critical that historic visitation levels into these parks be maintained. This principle should be incorporated into the final SEIS. Snowcoaches are unreliable and uncomfortable and will not be comparable replacements for snowmobiles. The public prefers to access the parks by snowmobile.

RESPONSE:

NPS has made clear its intent to maintain average annual visitation. It is the function of different alternatives to provide a mix of access modes while providing this level of visitation. Snowcoach comfort is subject to personal opinion. It is clear that the snowmobiling public prefers access via snowmobile. However, a majority of those who have provided comments would prefer access by snowcoach only.

LETTER 39. WASHINGTON STATE SNOWMOBILE ASSOCIATION**COMMENT:**

We support alternative 2 and the following concepts: A reservation system with daily entry limits based on historic daily averages, until a carrying capacity study is complete; requiring cleaner and quieter snowmobiles for entry into the parks, but EPA should regulate emissions instead of NPS; increase nonmotorized groomed trails and warming huts; strict enforcement of off-road use; sell park passes in advance, making permits more visible; lowering the speed limit to 35 mph from West Yellowstone to Old Faithful; restricting travel on park roads from 8 pm to 7:30 am; expand educational opportunities for user ethics, park rules, visitor safety and park resource appreciation; foster partnerships with surrounding communities, counties and states.

RESPONSE:

No response necessary.

LETTER 40. WESTERN ENVIRONMENTAL TRADE ASSOCIATION

COMMENT:

We support alternative 2 because it continues to allow snowmobile access to the parks on an individual and personal basis. We also support the following: reasonable limits on snowmobile numbers; sell park passes in advance; adequate numbers of park rangers; strict enforcement of speed limits, and a speed limit of 35 mph; No off-trail travel should be allowed; winter access to certain areas should be restricted; implementation of an Adaptive Management Plan for park operations; foster partnerships with surrounding communities, counties and states to expand educational opportunities for ethics, rules, safety and park resource appreciation.

RESPONSE:

No response necessary.

LETTER 41. WYOMING STATE SNOWMOBILE ASSOCIATION, INC.

COMMENT:

Adaptive management should be used to mitigate the impact of all users on the natural resources. The snowcoach-only approach has not been researched thoroughly enough to present as a viable alternative. The season should not be narrowed; many of the best snowmobiling days occur in February. The lower speed limits between Old Faithful and West Yellowstone present an opportunity to experience the park in a more leisurely fashion. The WSSA encourages the inclusion of economic data regarding impacts to the surrounding communities as well as to the state of Wyoming as a whole.

RESPONSE:

Adaptive management is a feature of all alternatives being considered, and as such is a part of the existing decision. However, adaptive management should not be regarded as a euphemism for doing nothing about impacts that we are presently aware of, until such time as there is more data. The purpose of the SEIS is to evaluate new snowmobile technology. The FEIS provides sufficient detail to support the selection of a programmatic plan allowing snowcoach use only. Implementation details do not affect the viability of the overall plan. Various measures in the decision relate to improving snowcoaches and working with communities to market a new winter visitor experience and make the plan work. A large percentage of the public, as gauged by the body of public comment, believes that motorized use monopolizes the entire winter season and that there is no time for others to enjoy peace and solitude. To balance uses and address this need, it is reasonable to allow a portion of the season to be snowmobile-free. Alternative 3 would close the park to snowmobiles the Friday after President's Day weekend. In the average year, the amount of time that would be available, snowmobile-free, is a week. This week coincides with the beginning of road-plowing efforts, warmer temperatures, problematic grooming, and generally poor snow conditions. It would seem reasonable to allow for a quiet time during the peak of the winter season.

LETTER 42. YELLOWSTONE CHAMBER OF COMMERCE: YELLOWSTONE, COOKE CITY, GARDINER, MONTANA; CODY AND JACKSON, WYOMING, CHAMBERS

COMMENT:

Gateway communities fulfill an important role in the mission to preserve and protect the parks by providing services beyond their borders. It is essential that decisions take into account the protection of these natural national treasures and the continued viability of the communities involved.

RESPONSE:

NPS agrees, with the caveat that the continued viability of gateway communities is not the responsibility of the park service, whereas the protection of park resources and values is. NPS is obliged to support gateway communities to the extent that protection of the park is ensured. The difficulty lies in gauging both the point at which resources, values and visitors are adversely affected and the point at which a community is no longer viable. NPS asserts that there is nothing in any alternative, selected or considered, that will render any gateway community as a nonviable entity.

COMMENT:

The gateway communities are concerned that resource needs are realistically evaluated and available and the time frame for any transition to assure historic winter use levels be maintained. Alternative 2 offers the best adaptive management plan, and thus, the highest probability for maintaining winter use levels.

RESPONSE:

See previous response.

Organizations That Generally Support the Existing Decision (26 Letters)

LETTER 43. ALLIANCE FOR THE WILD ROCKIES	
COMMENT:	We would like to incorporate by reference the comments submitted by the Fund for Animals.
RESPONSE:	Fund for Animal comments are included in this document.
COMMENT:	The park service is obliged to protect the unique qualities and natural resources of Yellowstone and Grand Teton. After reading the SEIS, it is clear that the NPS is acutely aware of this fundamental obligation under the NPS Organic Act and NPS Management Policies. Therefore, snowmobiling, which has been irrefutably shown to cause resource degradation and pose human health risks, must be stopped.
RESPONSE:	No response necessary.
COMMENT:	There is nothing in the SEIS to indicate that resource degradation resulting from snowmobile use can be mitigated absent a complete and outright ban on public snowmobile use. There is nothing in the SEIS that can reasonably lead NPS to issue a different decision than was issued in November 2000.
RESPONSE:	If the decision is different, there must be sufficient mitigation to eliminate impairment and adverse impacts on a variety of resources and values. Snowmobiling must be found to be consistent with park resources and values to be in compliance with mandates, regulations, policies, or executive orders. The rationale must be part of the record of decision. NPS states in the final rule implementing the decision that the reintroduction of snowmobiles into the parks can, in light of adverse impacts and impairment of park resources and values, only be accomplished by placing strict limitations on them. Some who commented on the earlier proposed rule suggested limiting numbers and requiring snowmobilers to travel in guided groups instead of ending snowmobile use. NPS responded by saying, “to achieve compliance with the applicable legal requirements while still allowing snowmobile use would require very strict limits on the numbers of both snowmobiles and snowcoaches. As a result, that would sharply limit overall winter use of the parks, reducing the opportunities for public enjoyment of the parks and causing even greater adverse impacts on affected gateway communities and businesses. We chose instead to allow use of the parks by snowcoaches, which, because they have far fewer and less extensive adverse impacts than snowmobiles, can be accommodated, we now believe, without numerical limits.”

LETTER 44. AMERICAN LANDS ALLIANCE, ET AL.

COMMENT:

Colorado Environmental Coalition, Colorado Mountain Club, Colorado Public Interest Research Group, High Country Citizens Alliance, Quiet Use Coalition, Rocky Mountain Recreation Initiative, San Juan Citizens Alliance, SINAPU, Southern Rockies Ecosystem Project, The Wilderness Society, Upper Arkansas and South Platte Project, Western Colorado Congress, White River Conservation Project. As the SEIS demonstrates, the decision to phase out snowmobile use in the parks was based on the best science. That decision must remain in place because it is the only way to protect America's first national park. Reasons include:

RESPONSE:

No response necessary.

COMMENT:

NPS' primary mandate to protect park resources and values. NPS has an affirmative responsibility to implement management actions that ensure full compliance with law, regulation and policy now and into the future.

RESPONSE:

No response necessary.

COMMENT:

2000 ROD and 2001 rule clear: snowmobiles impair park resources and values, violate NPS duty under guiding law, regulation and policy.

RESPONSE:

To clarify: snowmobile use as conveyed throughout the range of alternatives evaluated in the FEIS was found to impair park resources and values. The range of alternatives included some area closures and the use of cleaner and quieter snowmobiles. However, in all alternatives allowing snowmobiles, it was assumed that the historic, average amount of use would occur where the use was permitted. EPA agreed with the idea that at this level of use, snowmobiles (even cleaner and quieter ones) represented continued impairment. The only remaining means of addressing the issue, and the chief determinant for reducing the magnitude of impact, is to reduce the number of machines to some level at which adverse affects are demonstrably eliminated.

COMMENT:

2000 decision and 2001 rule were based on a comprehensive public process in which at each juncture the number of commenters supporting a ban on snowmobile use exceeded those who didn't.

RESPONSE:

No response necessary.

COMMENT:

2000 decision and 2001 rule were based on the best information available concerning snowmobile technology. Any new information is within the parameters analyzed in the FEIS. Relative to emissions, industry says one thing to NPS and another to EPA in comments on the EPA proposed rule.

LETTER 44. AMERICAN LANDS ALLIANCE, ET AL.	
RESPONSE:	No response necessary.
COMMENT:	Improved technology fails to address impacts to air quality and natural soundscapes. NPS went far beyond the HC and CO emission reductions advocated by industry in its previous analysis and found that such reductions failed to address impairment issues.
RESPONSE:	See response to comment 3, above.
COMMENT:	Improved snowmobile technology fails to address impacts to wildlife. The decision makers in 2000 and 2001 had the following tools – all of which were fully analyzed in the FEIS – to choose from: best available technologies, lower emissions standards, guided-only snowmobile tours; vehicle caps; adaptive management, education, enforcement and carry capacity. NPS laid out the most protective snowmobile alternative in FEIS alternative F. Even this alternative was found insufficient to protect park resources.
RESPONSE:	See response to comment 3, above.
COMMENT:	The DSEIS reconfirms the NPS 2000 decision to phase out snowmobiles: nothing is new to warrant a different outcome.
RESPONSE:	No response necessary.
COMMENT:	Air Quality: NPS is mandated to protect air quality, seeking to perpetuate the best possible air quality in parks. Snowmobiles destroy air quality wherever they are used. According to California Air Resource Board emissions data, one hour on a 2-stroke engine used by most snowmobiles produces more smog-forming pollution than a modern car creates in one year. The failure to act immediately violates the parks’ duties under the Clean Air Act and National Park Service Management Policy.
RESPONSE:	No response necessary.
COMMENT:	Human health risks: Snowmobiles emit a variety of identified substances directly into the environment, some of which are toxic, and known or probable carcinogens. Park and concession employees and visitors are exposed to these emissions.
RESPONSE:	NPS remains concerned about health risks for employees, concession workers and visitors.

LETTER 44. AMERICAN LANDS ALLIANCE, ET AL.	
COMMENT:	Impacts to wildlife: NPS regulations state that snowmobiles are prohibited except where designated and only when their use is consistent with the parks' natural, cultural, scenic... etc, and will not disturb wildlife. The prohibition against disturbance is a "no tolerance" restriction. NPS found that continued snowmobile use impairs wildlife and violates guiding laws, regulations and policies.
RESPONSE:	No response
COMMENT:	Socioeconomics: Contrary to what industry has claimed, the residents of West Yellowstone, MT, the most invested snowmobile economy in the region, are not uniformly in favor of continued snowmobiling in the parks. Over 150 business owners, elected officials and residents, nearly a third of the town's voting population signed a petition asking the Park Service and Congress to protect Yellowstone National Park.
RESPONSE:	NPS is aware of this. It is one reason why NPS believes there is sufficient business acumen and flexibility in the community to adapt to management changes in the park by diversifying and marketing new opportunities.
COMMENT:	The DSEIS, causing a 16 month delay in protecting Yellowstone and costing taxpayers \$2.4 million, arrives at the same determination: a phase out of snowmobiles is needed to protect park resources and values and provide a high quality visitor experience. Failure to follow through would be based solely on a desire to satisfy the snowmobile industry. Such a decision to allow continued degradation of the parks would be at odds with national park law, regulation and policy, a large body of science, and an extensive public process. In the meantime, an eminently feasible snowcoach plan sits on the books with an implementation plan thoughtfully laid out by the Park service two years ago. Sadly, little energy or resources have been expended to implement the existing decision.
RESPONSE:	No response other than to note that NPS has continued to work with partners to design a new generation snowcoach, and to consider/pursue opportunities for funding, development and production.

LETTER 45. BLUEWATER NETWORK
COMMENT: Bluewater Network fully supports the original winter use plan that banned recreational snowmobiling from YNP and GTNP. We believe that the DSEIS contains insufficient information for the NPS to legally overturn the original decision. Reasons are as follows.

LETTER 45. BLUEWATER NETWORK	
RESPONSE:	No response necessary.
COMMENT:	Snowmobiles degrade air quality, as supported by research by the California Air Resource Board (CARB) and Denver University. Among the demonstrated effects are permeation emissions from snowmobile fuel systems. These effects are ignored by the SEIS, which calls into question the thoroughness of the pollution analysis in the document.
RESPONSE:	The issue of “condensibles” has been considered. There is no supportable way, in the current analysis, to evaluate the contribution of condensibles to pollution in the system. It can be noted that there is a likelihood emissions are underestimated in the analysis. The FSEIS will provide a discussion of this phenomenon.
COMMENT:	Snowmobiles harass wildlife. Wildlife biologists across North America have documented the damage snowmobiles inflict on wildlife.
RESPONSE:	Such impacts are cited throughout the wildlife analysis in the FEIS and the DSEIS.
COMMENT:	Snowmobile noise destroys natural soundscapes. Snowmobile noise carries great distances, shattering the tranquility of the park and disrupting the enjoyment of other park visitors.
RESPONSE:	Impacts on soundscape not inconsistent with this observation are disclosed in the DSEIS.
COMMENT:	Snowmobiles threaten public safety. Snowmobiling is a dangerous sport.
RESPONSE:	Public health and safety is addressed in the DSEIS.
COMMENT:	Cleaner and quieter snowmobiles will not solve all problems. Machines currently pushed by industry still cause significant damage to the environment and wildlife. Ref. CARB report: while 4-strokes were substantially better in terms of discharging less of some of the most important pollutants, they emit more Nox and CO. Moreover, the new machines are unlikely to improve the craft’s horrific safety record or its impact on wildlife.
RESPONSE:	No response necessary.
COMMENT:	Snowcoaches reduce these impacts. The DSEIS clearly shows that conversion to a mass transit snowcoach system will significantly reduce impacts on air quality, wildlife, natural sounds and public health and safety.

LETTER 45. BLUEWATER NETWORK
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>New industry data does not support overturning the phase-out. Since most of the data industry submitted does not support their position, it clearly does not provide NPS with either the legal justification or the scientific evidence necessary to overturn the original decision.</p>
<p>RESPONSE:</p> <p>To clarify: snowmobile use as conveyed throughout the range of alternatives evaluated in the FEIS was found to impair park resources and values. The range of alternatives included some area closures and the use of cleaner and quieter snowmobiles. However, in all alternatives allowing snowmobiles, it was assumed that the historic, average amount of use would occur where the use was permitted. EPA agreed with the idea that at this level of use, snowmobiles (even cleaner and quieter ones) represented continued impairment. The only remaining means of addressing the issue, and the chief determinant for reducing the magnitude of impact, is to reduce the number of machines to some level at which adverse affects are demonstrably eliminated.</p>
<p>COMMENT:</p> <p>The SwRI study contains major flaws. The EPA rejects their study methods. Moreover, SwRI compares the cleanest snowmobiles against the dirtiest snowcoaches. A better method would be to compare clean against clean, which would show (based on EPA emissions data) that 15 passenger gas vans are far cleaner than even the best 4-stroke snowmobiles.</p>
<p>RESPONSE:</p> <p>In the FSEIS, NPS will attempt to fully explain and compare modeled assumptions for snowmobiles and snowcoaches. It remains NPS' intent, duly implementing the existing decision, to improve snowcoach technology in regard to emissions, sound, and visitor convenience. NPS agrees that the BAT applies to both modes of conveyance. The playing of snowcoach impacts against snowmobile impacts has been an attempt to divert NPS' attentions away from the main impetus for the SEIS, that being to evaluate new snowmobile technology and how it may mitigate impacts on park resources and values. In the comparison of the two modes of access, via alternatives in the SEIS, it is clear that overall impacts on the parks are significantly lower using snowcoach access only. Once again, this has much to do with the significantly lower number of vehicles allowed in this alternative.</p>
<p>COMMENT:</p> <p>Economic impacts. Industry representatives contend that a snowmobile prohibition will have dire consequences for surrounding communities. However, the exact opposite may be true. For example, past instances of park closure to snowmobiles did not result in a loss of resort tax receipts in West Yellowstone. Records indicate that local communities that remain solely dependent upon snowmobile operations may be hurting their long-term economic survival.</p>
<p>RESPONSE:</p> <p>NPS acknowledges this and points out that some residents and business people from West Yellowstone convey the same notion.</p>

LETTER 45. BLUEWATER NETWORK

COMMENT:

Broad public support for phase-out. The DSEIS comment period is the fifth time NPS has solicited public input on this issue. During every one of the previous comment periods, the public has overwhelmingly stated that it wants snowmobiles removed from these parks.

RESPONSE:

No response necessary.

LETTER 46. FLY ROD & REEL: THE MAGAZINE OF AMERICAN FLY-FISHING

COMMENT:

The air and noise pollution and the disruption of wildlife currently being caused by snowmobiles in Yellowstone violate the spirit if not the letter of the National Park charter. National parks are among the few places left where both humans and animals can escape the high-pitched whine of motors and the stink of exhaust. I think your responsibility in this matter is clear and obvious regardless of political pressures and I strongly suggest that you select Alternative 1a.

RESPONSE:

No response necessary.

LETTER 47. FRIENDS OF ANIMALS

COMMENT:

Snowmobiles produce noise and air pollution. They displace and frighten wildlife and disturb animals and birds in their native habitat. Wildlife across the country is being subjected to increased human interference every day. Our national parks should provide wildlife with a respite and refuge from harmful intrusion.

RESPONSE:

These impacts are disclosed in the FEIS and DSEIS.

COMMENT:

Snowmobile use has been linked to increasing numbers of wild buffalo migrating out the YNP via the groomed trails. Buffalo who wander out are being subject to cruel harassment, capture and slaughter buy Montana DOL. Phasing out snowmobiles may play an important role in reducing the abuse of our precious buffalo.

RESPONSE:

No response.

LETTER 48. GREATER YELLOWSTONE COALITION, ET AL.

COMMENT:

Natural Resources Defense Council, The Wilderness Society, Natural Trails and Waters Coalition, National Parks Conservation Association, Defenders of Wildlife, Sierra Club, Jackson Hole Conservation Alliance, and Wyoming Outdoor Council. New efforts were implemented this year to reduce the impacts of snowmobile use, at a cost of more than a quarter million dollars. Even with mitigation measures including extensive visitor education and increased ranger presence, hundreds of snowmobilers were cited and warned this season for ignoring speed limits, and other park rules. A record number of citations for snowmobile violations were logged this year. Videographers and scientists recorded snowmobiles pushing park wildlife from its natural habitat. Visitors found it difficult to hear natural sounds because of the constant whine and roar from snowmobiles. Instead of a peaceful, quiet winter wonderland, visitors today are welcomed by extreme noise, choking pollution, noxious odors and rangers in respirators. Specific findings and points of concern are these:

RESPONSE:

A new decision has these issues to contend with. The issues reflect the statement of purpose and need for action in the FEIS. Clearly, enforcement is not the only key to mitigating impacts as NPS has stated throughout this process. The cost of mitigation, including additional enforcement and adaptive management implementation, will increase with the number of machines to be allowed.

COMMENT:

The NPS primary mandate is to protect park resources and values.

RESPONSE:

No response.

COMMENT:

2000 ROD and 2001 rule clear: snowmobiles impair park resources and values, and violate NPS duty under guiding law, regulation and policy.

RESPONSE:

NPS states in the final rule implementing the decision that the reintroduction of snowmobiles into the parks can, in light of adverse impacts and impairment of park resources and values, only be accomplished by placing strict limitations on them. Some who commented on the earlier proposed rule suggested limiting numbers and requiring snowmobilers to travel in guided groups instead of ending snowmobile use. NPS responded by saying, “to achieve compliance with the applicable legal requirements while still allowing snowmobile use would require very strict limits on the numbers of both snowmobiles and snowcoaches. As a result, that would sharply limit overall winter use of the parks, reducing the opportunities for public enjoyment of the parks and causing even greater adverse impacts on affected gateway communities and businesses. We chose instead to allow use of the parks by snowcoaches, which, because they have far fewer and less extensive adverse impacts than snowmobiles, can be accommodated, we now believe, without numerical limits.”

LETTER 48. GREATER YELLOWSTONE COALITION, ET AL.	
COMMENT:	EPA comments support the 2000 decision and 2001 rule. The analysis presented clearly indicates FEIS Alternative G would provide the best available protection to human health, wildlife, air quality, water quality, soundscapes and visibility while maintaining motorized and nonmotorized access to the parks.
RESPONSE:	No response necessary.
COMMENT:	The District Court of Utah (in Southern Utah Wilderness Alliance v. Dabney) recently clarified that NPS is not in the business to provided recreational opportunities if those recreational pursuits contravene NPS policy and the Organic Act. Protection of the resource comes first.
RESPONSE:	No response necessary.
COMMENT:	NPS regulations are protective and presumptive against snowmobiles. Snowmobiles are generally prohibited except where their use is consistent with natural, cultural, scenic and aesthetic values, safety considerations, park management objectives, and will not disturb wildlife or damage park resources. Executive Orders 11644 and 11989 prohibit adverse snowmobile impacts.
RESPONSE:	No response.
COMMENT:	NPS policy requires highest protection and restoration of national parks. In cases of doubt as to impacts, the service is to decide in favor of protecting natural resources.
RESPONSE:	No response necessary.
COMMENT:	2000 ROD and 2001 rule were based on a comprehensive public process, and the best information concerning snowmobile technology.
RESPONSE:	No response.
COMMENT:	Improved snowmobile technology fails to address snowmobile impacts to air quality, natural soundscapes and wildlife.
RESPONSE:	Improved snowmobile technology could address impacts, along with reduced numbers of snowmobiles and a suitable administrative means to assure both.

LETTER 48. GREATER YELLOWSTONE COALITION, ET AL.	
COMMENT:	NPS analyzed alternatives examining improved snowmobile technologies for the 2000 decision and found them insufficient to protect park resources.
RESPONSE:	NPS agrees. FEIS alternatives B and D provided for improved technology with a number of years' phase in and a number of other mitigation measures.
COMMENT:	DSEIS reconfirms the 2000 decision to phase out snowmobiles; there is nothing new to warrant a different outcome.
RESPONSE:	No response.
COMMENT:	Impacts to park resources in FEIS and DSEIS snowmobile alternatives violate NPS legal requirements for air quality, whereas alternatives G and 1a ensure protection of air quality.
RESPONSE:	No response.
COMMENT:	The DSEIS fails to analyze critical air quality information. In order to fully understand the impacts of snowmobile pollution in the parks, NPS must complete a PSD increment analysis for both PM ₁₀ and PM _{2.5} . It must complete an analysis of impacts on visibility, whereas visibility is frequently affected in the park based on anecdotal, video and photographic evidence.
RESPONSE:	PSD and visibility analyses will be present in the FSEIS.
COMMENT:	Alternative 2 proposes that NPS act beyond its authority to implement EPA standards before the regulations are final or before they are implemented. Alternative 3 relies upon "best available technology", which is not adequately defined in the document.
RESPONSE:	Implementation of alternative 2 is problematic for NPS. BAT will be better defined in the FSEIS.
COMMENT:	The DSEIS uses flawed assumptions regarding snowcoach technology. It undertakes a false comparison between snowcoaches and snowmobiles. Risk of perpetuating this comparison is elevated by the State of Wyoming's study of snowcoach emissions, and NPS' stated intent to consider this report further in the FSEIS. NPS has failed to analyze the best available snowcoach technology, while accepting information about new snowmobiles from the snowmobile industry.

LETTER 48. GREATER YELLOWSTONE COALITION, ET AL.	
RESPONSE:	There is no intent to compare snowmobiles and snowcoaches directly in the SEIS. Scenarios of travel in the parks, clearly, consist of snowcoach only in alternatives 1a and 1b and mixed snowcoach and snowmobile travel in the others. The State of Wyoming and others have attempted to turn the analysis into a referendum on snowcoaches. However, the stated intent of the SEIS is to evaluate new snowmobile technology and how it can mitigate impacts disclosed in the FEIS. Snowcoach only (motorized) travel into the parks, BAT or not, provides the least impacting form of access. NPS has provided, in the existing decision, measures to be taken to improve snowcoach technology. The SEIS will clarify the desire to take a BAT approach to both modes of access.
COMMENT:	The DSEIS fails to analyze critical health impacts information such as PM2.5, benzene, or MTBE, about which there is recent concern and advances in understanding. NPS fails to consider the synergistic effect of all toxic components of snowmobile exhaust. The recent Kado report, confirming serious health risks caused by snowmobiles, must be incorporated into the analysis.
RESPONSE:	Discussion of toxics such as these is present in the FEIS. The FEIS is the parent document to which the SEIS is tiered. NPS does not have the means of evaluating synergistic effects among all pollutants. Material from the report will be summarized in the FSEIS.
COMMENT:	GYC and NPCA performed an audibility study at 13 sites in Yellowstone. Eleven sites had snowmobile noise more than 70% of the time, and 8 were impacted more than 90% of the time.
RESPONSE:	This information tends to support the analysis provided through modeling.
COMMENT:	DSEIS reconfirms the 2000 decision findings of potential economic opportunities through implementation of a snowcoach system.
RESPONSE:	No response

**LETTER 49. ISAAC WALTON LEAGUE OF AMERICA, INC.,
COLORADO DIVISION**

COMMENT:

The League assembled in convention in Denver, Colorado, on May 11 2002. By unanimous vote, the members strongly urge the installation of controls on number and only tours of snowmobiles in YNP in winter due to their harassment of wildlife, the pollution by the engines and the shattering of winter solitude. Restricting snowmobiles to less polluting 4-cycle engines, to a maximum of 400 a day and to guided tours only would help the situation.

RESPONSE:

No response necessary.

LETTER 50. JACKSON HOLE CONSERVATION ALLIANCE

COMMENT:

The alliance views YNP and GTNP as the core of the Greater Yellowstone Ecosystem. These areas are vital to the natural functioning ecosystem, where such functions should take priority over motorized recreation. Our detailed comments are included with those of the Greater Yellowstone Coalition and other conservation groups.

RESPONSE:

No response necessary.

COMMENT:

The alliance supports SEIS alternative 1a because the issue has already been examined with great scientific scrutiny. It has been shown that there is no new scientific information that warrants a change from the existing decision.

RESPONSE:

No response necessary.

LETTER 51. KETTLE RANGE CONSERVATION GROUP

COMMENT:

The current SEIS process was initiated under intense pressure from the snowmobile industry, which has much to gain from overturning the original decision. Evidencing their lack of scientific basis for the request for additional analysis, the industry was unable to offer any new research or data to be analyzed in the SEIS. Four key points to consider.

RESPONSE:

No response necessary.

LETTER 51. KETTLE RANGE CONSERVATION GROUP	
COMMENT:	The “cleaner and quieter machine” approach pushed by industry will do nothing to reduce the impact of the more than 1.4 million snowmobiles currently operating on public lands. Research has shown that the impacts of snowmobiles on wildlife go far beyond the effects of engine noise.
RESPONSE:	The FEIS and DSEIS analyze such impacts.
COMMENT:	Although NPS is obligated to provide appropriate opportunities for outdoor recreation, the Organic Act dictates that such recreation not impair park resources and values.
RESPONSE:	The DSEIS quotes passages from laws, regulations, executive orders and policies that relate to snowmobile issues.
COMMENT:	Americans want the parks to remain peaceful places in winter where wildlife are not harassed and visitors should not have to struggle through a constant roar of machines to hear Old Faithful. Snowmobile use would continue to pollute, make ranges sick and prevent visitors from enjoying the solitude that Americans expect from their national parks.
RESPONSE:	No response.
COMMENT:	The snowmobile industry has worked hard to discredit a snowcoach solution. However, an additional study, conducted as a result of an industry lawsuit, revealed once again that snowmobiles will produce more pollution, noise, and disruption of wildlife than snowcoaches.
RESPONSE:	No response.

LETTER 52. LAST CHANCE AUDUBON SOCIETY, HELENA MT	
COMMENT:	As birdwatchers and viewers of wildlife, the operation of thousands of noisy, smoky machines within the boundaries of YNP has had a negative impact on our winter experiences in the park for years. We would not object to the use of a limited number of park-operated snowcoaches to transport winter visitors from West Yellowstone to Old Faithful Inn during the winter season.
RESPONSE:	Impacts on visitor experience, including impacts such as these, are disclosed in the FEIS and the DSEIS.

LETTER 52. LAST CHANCE AUDUBON SOCIETY, HELENA MT
<p>COMMENT:</p> <p>We do not believe it appropriate for NPS policy to be dictated by commercial interests either inside or outside the park. Solitude is an increasingly rare commodity, and if it cannot be found in our national parks we have a serious cultural problem.</p>
<p>RESPONSE:</p> <p>No response.</p>

LETTER 53. NOISE POLLUTION CLEARING HOUSE (NPC), MONTPELIER VT
<p>COMMENT:</p> <p>There is an unprecedented growth in the sources of noise in the U.S. The DSEIS correctly recognizes that "natural sounds and tranquility are major resources of many national parks and are valued by visitors. Peace and natural quiet are in short supply in our country today, and our parks provide one of the few places where citizens have access to these valuable resources. In the 1980's, I took a skiing trip to Yellowstone and was forced to listen to the drone of snowmobiles, not the natural soundscape. I have not returned.</p>
<p>RESPONSE:</p> <p>No response.</p>
<p>COMMENT:</p> <p>The case for alternative 1a is much stronger than the SEIS states. The analysis of noise neglected, misrepresented, or understated four key factors: the noise footprint of each vehicle type, the number of instances of interference, the effect of the cumulative vehicle miles traveled, and the fair comparison of noise levels between snowmobiles and snowcoaches. In addition, the definitions of impacts to natural soundscapes are flawed.</p>
<p>RESPONSE:</p> <p>No response</p>
<p>COMMENT:</p> <p>Noise footprint: the data in table 80 approaches the concept of noise footprint, but does so only in one dimension – horizontally from the line of travel. The effect of these vehicles is felt in two and sometimes three dimensions. At the very least, table 80 should be supplemented with another table giving the square mile footprint of types and groups (data provided). The major difference is that the area impacted is governed by the formula $\pi \times \text{radius squared}$ – the absence of the squared factor significantly understates the footprint and impact of the vehicle. SEIS table 80 provides the mistaken impression that a single snowmobile has a 70% greater impact on audibility than a Mattrack snowcoach, when in fact the impacted areas is 3-4 times as great.</p>
<p>RESPONSE:</p> <p>The area of audibility being a circle rather than just a line is true. However, the issue NPS desires to address is how far one must go away from a road (a linear feature) such that oversnow vehicle sound is not audible.</p>

LETTER 53. NOISE POLLUTION CLEARING HOUSE (NPC), MONTPELIER VT
<p>COMMENT:</p> <p>Instances of interference and vehicle miles traveled: This factor is a very important indicator of noise that was ignored in the SEIS. Use of these factors would indicate that the impact of snowcoaches is significantly less than currently stated.</p>
<p>RESPONSE:</p> <p>NPS believes that evaluation of sound levels, the distribution of higher sound levels through the travel corridors, and the area of audibility (stratified by percentage of time audible) are sufficient representations of impacts as they apply to different scenarios of usage in the alternatives.</p>
<p>COMMENT:</p> <p>A fair comparison of noise levels between snowmobiles and snowcoaches: area of audibility is a better comparison between vehicle types than is distance to the side that noise can be heard. Table 78 should be supplemented with data comparing groups of snowmobiles with snowcoaches as table 80 does, illustrating the idea that snowcoaches can displace many snowmobiles with much less impact.</p>
<p>RESPONSE:</p> <p>NPS will review the tabular presentations.</p>
<p>COMMENT:</p> <p>Flawed definitions of impacts to natural soundscapes: Current definitions do not adequately reflect to importance of natural quiet. No effect ought to mean inaudible. The noise of any internal combustion engine or any amplified noise within a national park should not qualify for negligible effect. Audible less than 50% of the time is not a minor impact, just as disrupting 50% of the landscape is not a minor impact.</p>
<p>RESPONSE:</p> <p>The definitions will be reviewed and amended for the FSEIS if appropriate. The comment illustrates that there is some subjectivity in defining levels of effect.</p>

LETTER 54. PARK COUNTY ENVIRONMENTAL COUNCIL
<p>COMMENT:</p> <p>Yellowstone rangers should not have to wear respirators to perform their jobs. Wildlife should not have to contend with stress and commotion from tens of thousands of snowmobiles each winter. Visitors should not have to struggle through a nearly constant roar of machines to hear Old Faithful geyser.</p>
<p>RESPONSE:</p> <p>NPS agrees. See purpose and need for action in the DSEIS and FEIS.</p>

LETTER 54. PARK COUNTY ENVIRONMENTAL COUNCIL

COMMENT:

Will protection of YNP and GTNP be entrusted to park service professionals – from whom the original decision to phase out snowmobiles came after years of research and analysis – or will the future of these parks be handed over to the snowmobile industry?

RESPONSE:

No response necessary.

COMMENT:

The new document makes clear again that only a snowcoach system can fully protect park resources. The study lays bare that YNP will be noisier, dirtier, and more stressful for wildlife if snowmobile use is allowed to continue. If snowmobiles are not phased out, the amount of parkland dominated by the roar and whine of machines would be 10 to 20 times greater than visitors would experience with snowcoach access, and would spew three times more carbon monoxide.

RESPONSE:

No response necessary.

**LETTER 55. PHYSICIANS FOR SOCIAL RESPONSIBILITY
THE LETTER WRITER IS THE PUBLIC HEALTH PROGRAM DIRECTOR**

COMMENT:

The health of park employees has been put at risk. Scientists have proven that long-term exposure to air toxicants in snowmobile exhaust is dangerous and poses a threat to human health. We believe the Park Service has a duty and responsibility to protect visitor and employee health and to provide for the best possible air quality in these Class 1 airsheds. The Park Service should move forward with implementing a safer and less polluting snowcoach system.

RESPONSE:

Part of the purpose and need for action is to protect health and safety of visitors and employees. This is a basic tenet in NPS mandates. Use in Class I airsheds is to be managed as to prevent any significant deterioration of air quality. NPS has the affirmative responsibility to protect air quality as a park resource. The decision should document how NPS is achieving this while allowing activities that tend to degrade air quality.

LETTER 56. PREDATOR CONSERVATION ALLIANCE

COMMENT:

We strongly support the decision to phase out snowmobiles as put forth in the previous ROD. We are enclosing our previous comments to be included as part of this letter. The attached comments refer to the 1999 draft EIS. Major points:

LETTER 56. PREDATOR CONSERVATION ALLIANCE	
RESPONSE:	No response.
COMMENT:	Support for a mass transit alternative, with groomed routes, that bans snowmobiles parkwide is conditional on formulation of a bison management plan that tolerates free ranging bison outside the park.
RESPONSE:	Granted, the cumulative impacts of park use and management upon bison are critical. Management of winter use within the park cannot be totally contingent upon what happens outside the park.
COMMENT:	We remind NPS of reports produced by Dr. Mary Meagher that provide important information about the effect of winter recreation on bison populations and distributions.
RESPONSE:	See letter from Dr. Meagher, which refers to her recent analysis and report. These materials will be referenced and discussed in the FSEIS.
COMMENT:	There is ample scientific justification for managing or addressing the current levels of winter use. Ref. James Caslick, PhD, et al.
RESPONSE:	NPS agrees.
COMMENT:	We advocate the closure of the east entrance in order to eliminate the practice of shooting avalanches with a howitzer. Closure of this segment would return a large part of YNP to a near pristine winter process.
RESPONSE:	This measure was evaluated in the FEIS.
COMMENT:	Wildlife concerns remain in regard to direct and indirect impacts on other species, including grizzly bears, wolves, lynx, and wolverines.
RESPONSE:	Impacts on these species were evaluated in the FEIS and related Biological Assessment. The impacts of SEIS alternatives would be no different than those shown in the FEIS.

LETTER 57. PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY	
COMMENT:	PEER supports the decision to phase out snowmobile use from YNP and GTNP. Reasons for this support are as follows.
RESPONSE:	No response necessary.
COMMENT:	In YNP, concerns about public health and excessive snowmobile pollution were issues raised in 1200 snowmobile complaint letters during 1993-94. Subsequent studies found CO and particulate concentrations high enough to justify health concerns. NPS has repeatedly acknowledged the deleterious effects to health and air quality caused by snowmobiles. Science supports these concerns.
RESPONSE:	No response.
COMMENT:	Park employees are particularly negatively impacted by the adverse pollution and other impacts caused by snowmobiles. This past winter, employees were outfitted with respirators to minimize exposure. NPS has failed to analyze the synergistic health effects on vulnerable populations, and effects on employees who have worked under these conditions for many years.
RESPONSE:	A recent study on occupational exposure to toxic air pollutants from snowmobile use in YNP is discussed and cited in the FSEIS. NPS believes there is no effective means for judging the synergistic effects of multiple toxics. Anecdotally, one could assume that the effects presented in the report, or the symptoms that employees have presented with are the result of a synergism of all the pollutants they are exposed to. A study of long-term employees might be in order, however the population of employees who have worked at winter entrances, especially West Yellowstone, for many years might be very small. The position is seasonal, and employees tend not to stay very long at that location.
COMMENT:	NPS has a duty to protect employee and visitor health and safety from the debilitating effects of carbon monoxide and particulate matter produced by increasing numbers of snowmobiles. Current snowmobile use precludes the parks' ability to achieve this.
RESPONSE:	NPS agrees it has a very important, even critical, duty in this regard. We note that snowmobile users willingly put themselves in this environment. Protection of employees and other visitors must be suitably addressed in the decision to be made.

LETTER 57. PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY
<p>COMMENT:</p> <p>Alternative 1a will provide the best protection to employees and public health and therefore should be selected. EPA also concludes that this alternative is most protective. The NPS decision to phase out snowmobile use in the two parks was based on the best science as demonstrated by conclusions of the EIS, DSEIS and EPA.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>

LETTER 58. ROCK THE EARTH, PITTSBURGH PA
<p>COMMENT:</p> <p>Rock the Earth describes itself as an unincorporated not-for-profit group of citizens who regularly use the national park system, year-round, for recreational activities. The organization believes that they are obliged to protect Yellowstone and Grand Teton National Parks. They believe that the continued use of snowmobiles in the parks will devastate the naturally wild environment, including air quality, wildlife habitat, and natural quiet. Most of the information cited in this comment is in the administrative record.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>The laws directing the NPS activities (NPS Organic Act, General Authorities Act, Executive Orders, regulations) support SEIS alternative 1a. The NPS policies and other guidance also support the selection of alternative 1a.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>In light of the FEIS and November, 2000, ROD, the NPS director will be unable to conclude that the activities proposed in alternatives 2 and 3 will not cause an impairment of park resources and values. Additionally, since the NPS must eliminate activities causing impairment as soon as possible, and nothing in the SEIS supports extending the decision in the ROD, the NPS must select alternative 1a.</p>
<p>RESPONSE:</p> <p>These arguments must be addressed in the record of decision.</p>
<p>COMMENT:</p> <p>NPS policies on use of national parks also support the selection of alternative 1a.</p>

LETTER 58. ROCK THE EARTH, PITTSBURGH PA
<p>RESPONSE:</p> <p>There must be a significant difference in the overall or cumulative impacts associated with snowmobile use if they are to be allowed in the parks. In order to meet policy and law regarding existing impairment and adverse impacts, strict limitations must be placed upon them – as stated in the current rule.</p>
<p>COMMENT:</p> <p>Air quality and sound impacts support the selection of alternative 1a.</p>
<p>RESPONSE:</p> <p>See previous response.</p>
<p>COMMENT:</p> <p>The SEIS presented no new socioeconomic information that warrants a selection of any alternative other than 1a.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>

LETTER 59. SCHUBERT AND ASSOCIATES
<p>COMMENT:</p> <p>Representing The Fund for Animals, The Humane Society of the United States, Biodiversity Legal Foundation, and Ecology Center. The represented entities do not support any of the alternatives evaluated in the SEIS. While alternative 1a is preferred above other SEIS alternatives, NPS’ failure to comprehensively evaluate a no-oversnow motorized access, no road-packing/grooming alternative prevents full support of any alternative. Alternative 1a, while reducing impacts, does not preserve nature as it exists and therefore does not meet the basic NPS mandate.</p>
<p>RESPONSE:</p> <p>Fund for Animals continues to make this comment. NPS has responded in each case with its rationale for not including such an alternative, and makes reference to Volume III Part 1 of the FEIS. In short, NPS has the authority and responsibility to set the scope of analysis, which in turn sets the range of alternatives. NPS eliminated consideration of a “no access” alternative, when it described the need for a providing a range of appropriate winter visitor experiences, and reduction in oversnow motorized vehicle impacts. NPS also evaluated an alternative which eliminated use and grooming in the area of the park that is most at issue relative to bison – alternative F.</p>
<p>COMMENT:</p> <p>NPS must, at a minimum, select 1a since it cannot provide through the SEIS a reasoned analysis for changing its 2001 decision (citation). Selection of 1a will not shield NPS from litigation due to its failure to consider a “no-grooming alternative,” and the remaining alternatives cannot be selected since they would result in continued impairment.</p>

LETTER 59. SCHUBERT AND ASSOCIATES	
RESPONSE:	A new decision must be accompanied by rationale that deals with existing impairment and adverse impacts that must be eliminated to be consistent with park resources and values – in accordance with law and policy
COMMENT:	The failure to consider a “no-grooming alternative” is particularly egregious considering the requirements of NEPA, NPS policies, and repeated requests from my clients to do so (enclosures). Although the entire basis for the SEIS process is due to political promises by the Bush administration, the NPS is required to manage the parks as specified by law, not politics.
RESPONSE:	See previous responses.
COMMENT:	Failure of NPS to properly consider a no-oversnow motorized access, no road-packing/grooming alternative:
RESPONSE:	See previous responses.
COMMENT:	NPS has blatantly failed to prove that oversnow access does not impair or disturb park wildlife. To avoid addressing this issue, NPS has made and broken a series of agreements and promises intended to properly study and evaluate this matter.
RESPONSE:	The existing record of decision found that FEIS alternative G, or SEIS alternative 1a, would not impair park resources and values, and would not have a significant adverse impact on wildlife.
COMMENT:	The SEIS provided NPS another opportunity to fully disclose and evaluate these impacts. NPS has elected to continue to ignore the issue and by doing so to continue to violate its statutes, regulations, and policies. Clients will consider options to reverse such an outcome.
RESPONSE:	NPS did not have another opportunity in the SEIS to, in effect, evaluate a “no access – no grooming” alternative. The scope of analysis was limited to reviewing new snowmobile technology in the light of the existing purpose and need for action.
COMMENT:	NPS must adapt a no-oversnow motorized access, no road-packing/grooming alternative in order to comply with federal statutes, regulations, policies, executive orders and the scientific evidence.
RESPONSE:	See previous responses.

LETTER 59. SCHUBERT AND ASSOCIATES
<p>COMMENT:</p> <p>To evaluate this comment letter, NPS must re-examine all documents referenced herein. These are provided in enclosures 1-7.</p>
<p>RESPONSE:</p> <p>NPS will not again review documents available to it prior to the decision on the FEIS. Among the documents to be reviewed is the more recent paper by Taper, Meagher and Jerde.</p>
<p>COMMENT:</p> <p>Like the intent of relevant statutes, regulations and policies referred to in this letter and displayed in the DSEIS, the evidence supporting the significant adverse impacts, impairment, and disturbance associated with snowmobiling, snowcoach operation and snow packing/grooming is also crystal clear. Enclosures provide an exhaustive analysis of such adverse impacts to wildlife, air and water quality, vegetation, natural quiet, and park visitors who participate in nonmotorized recreation activities.</p>
<p>RESPONSE:</p> <p>Impacts of all these aspects of winter use are evaluated and disclosed in the FEIS, including those associated with packing/grooming,</p>
<p>COMMENT:</p> <p>There is no dispute that Yellowstone bison use the packed roads as travel routes. The controversy surrounds the frequency of such use and the short and long-term implications of the use. This controversy is misplaced and is primarily a product of short-term, deficient, and ill-conceived studies and/or analyses. The reality is that bison use the packed road system, and the implications of such use are significant. NPS continues to discount or ignore this reality as it relates to bison population dynamics. NPS emphasizes some bison studies that the Fund has shown to be deficient, while ignoring the most comprehensive data sets on population dynamics, and implications thereof, produced by Dr. Meagher.</p>
<p>RESPONSE:</p> <p>NPS recognizes alternative theories, and has acknowledged them in the EIS as required in the CEQ regulations (e.g., FEIS pages 146-147). Additional review of more recent literature supplements these discussions in the FSEIS.</p>
<p>COMMENT:</p> <p>The prohibition of snowmobile use in the parks, while beneficial, could result in increased direct, indirect and cumulative impacts associated with wildlife use of the groomed road system. By limiting oversnow motorized access to snowcoaches, the number of vehicles using the roads will decline. Consequently, wildlife, including bison, use of the roads may increase and could result in serious and adverse impacts to a variety of wildlife by unnaturally altering wildlife distribution, movement, and habitat use patterns; population dynamics, predator/prey interactions; and ecological relationships and processes within the parks.</p>

LETTER 59. SCHUBERT AND ASSOCIATES	
RESPONSE:	NPS fails to see how prohibition of snowmobile use could be both beneficial and have increased impacts on wildlife. If there were increased direct, indirect and cumulative impacts on wildlife because of fewer vehicles, then it appears the comment argues for more vehicles. The argument revolves back to one of the impact of groomed routes alone, which has been discussed in the FEIS (the discussion relative to bison is found on FEIS pages 238-239).
COMMENT:	The benefits of packed road use in terms of energy conservation will increase substantially as there will be less traffic, and less opportunity for a negative interaction with a vehicle. NPS assumes that such impacts will be beneficial to wildlife but has blatantly ignored all of the potential adverse impacts associated with this scenario.
RESPONSE:	See previous response.
COMMENT:	The SEIS does not contain new information or evidence which justifies reversing the decision to phase out snowmobile use in the parks. At a minimum, though not consistent with NPS legal mandates, NPS must select and implement alternative 1a as its preferred action.
RESPONSE:	See response to comment 2.
COMMENT:	The SEIS is the product of a politically influenced settlement agreement to which NPS inappropriately conceded that the analysis regarding technological improvements was not complete and that there was insufficient opportunity for public comment. These excuses were manufactured by government to justify the settlement agreement and its ulterior motive to reverse the snowmobile phase-out decision.
RESPONSE:	No response.
COMMENT:	New information was not provided in the settlement time frame by industry, and it is unclear that any new effective information has been provided at all. Even if snowmobiles are cleaner and quieter, they still adversely impact park resources.
RESPONSE:	NPS agrees.
COMMENT:	The FEIS and [existing] ROD provide a smorgasbord of evidence documenting the adverse impact of snowmobiles on the parks and park wildlife, air and water quality, natural quiet and other park visitors. The SEIS provides no new evidence to reverse the selection of alternative G as the preferred action.

LETTER 59. SCHUBERT AND ASSOCIATES	
RESPONSE:	No response necessary.
COMMENT:	Specific comments on the content and analysis in the SEIS. Even a cursory review of the SEIS reveals that it was prepared in great haste to meet the time deadlines imposed in the ISMA settlement. The rush to complete the document has raised several issues requiring comment.
RESPONSE:	No response.
COMMENT:	Use of surveys: whether or not motorized use is to be permitted in the park must be based on whether such actions violate the impairment or disturbance standards imposed by NPS Organic Act. If it is determined, based on the best available scientific evidence that such standards are exceeded then the actions must be eliminated regardless of public survey results.
RESPONSE:	NPS agrees that the source of impact or impairment must be eliminated or modified as to be consistent with park resources and values. If impairment is found, action must be immediate.
COMMENT:	Cooperating Agencies: the involvement of state and county cooperators in the SEIS is in violation of NEPA (see enclosures). In this case, neither the NPS or the cooperators have disclosed or evaluated the alleged "special expertise" brought to the table by each of the Cooperating Agencies. The need for special expertise is the authorizing basis for designating a Cooperating Agency under NEPA. The inclusion of the states and counties in the original DEIS process was the result of political chicanery orchestrated by CEQ without acceptance or approval by NPS of Department of Interior. NPS/DoI exacerbated this initial mistake by inviting the cooperators to participate in the SEIS process.
RESPONSE:	No response.
COMMENT:	Economic analysis: NPS has gone far beyond the NEPA requirement for economic analysis in relation to state, county and local economies. Economic impacts on other entities was for the other entities to consider. NPS is not responsible for the economic well-being of those entities and cannot undermine its legal obligation to protect the parks because of misguided management decisions by other entities. The economic analysis is deficient because it did not consider the economic value of restoring naturalness, reducing pollution, or protecting wildlife.

LETTER 59. SCHUBERT AND ASSOCIATES
<p>RESPONSE:</p> <p>NPS believes the economic analysis to be sufficient. The FSEIS has additional discussion on community impacts. The FEIS contains a discussion on page 122 of non-economic costs and benefits. In essence, disclosing the beneficial impacts on resources and values in economic terms is not a necessity under NEPA, and it would be highly subjective. Beneficial and adverse impacts on park resources and values, judged by comparing alternatives, can be viewed generally as opportunity costs of allowing or disallowing use – in this case snowmobiling. The comparison is evident, so there is no need to phrase the analysis in terms of opportunity costs.</p>
<p>COMMENT:</p> <p>New technology: ISMA lawsuit was based upon the alleged failure of NPS to consider technological advances in snowmobiles. The ISMA settlement agreement explicitly provides the plaintiffs with an opportunity to provide new data and evidence. The deadline for the information passed without any substantive new information from ISMA.</p>
<p>RESPONSE:</p> <p>NPS agrees.</p>
<p>COMMENT:</p> <p>The actual analysis of emissions and their impacts in the SEIS is both confusing and deficient (examples provided).</p>
<p>RESPONSE:</p> <p>NPS will clarify the FSEIS analysis.</p>
<p>COMMENT:</p> <p>NPS does not accurately reflect its legal mandates in the statement of purpose and need. Also, NPS has delineated a new desired condition in the SEIS which is entirely inconsistent with its legal mandates. It institutes an irreparable harm standard not consistent with NPS statutes, regulations or policies that prohibit any activities that result in impairment of or disturbance to park wildlife, resources or values.</p>
<p>RESPONSE:</p> <p>There is an irreparable harm standard. However, there is also the standard of eliminating adverse effects or disturbance, relative to wildlife, and rendering uses consistent with park resources and values. The former does not invalidate the latter, but it may require decisive and immediate action.</p>
<p>COMMENT:</p> <p>The relationship between existing concession contracts and the ability of NPS to implement an action that may impact them is not clear. The SEIS infers that the existence of a contract supercedes the basic requirement to eliminate impairment or address adverse impacts. The FSEIS must clarify this issue.</p>

LETTER 59. SCHUBERT AND ASSOCIATES

RESPONSE:

If the inference can be found, it will be excised. The site-specific action of plowing versus grooming the route from Colter Bay to Flagg Ranch, a matter of contract, does not hinge on a determination of impairment. The impairment is associated with the use of the route by snowmobiles. The decision to go to snowcoach-only access does not discriminate for Flagg Ranch by allowing snowmobiles until the contract runs its course.

COMMENT:

There is no room for interpretation, mitigation or half-way meeting the law in this decision. Either NPS fully protects the parks and their wildlife or it doesn't. It is also not a question of balancing wildlife protection with public use, as there is no law which requires that snowmobiles or snowcoaches be provided access into the parks, or that roads be packed to facilitate such access.

RESPONSE:

It is fundamental to NPS management that, first, resources are protected. Then, uses are allowed and balanced among one another to the extent they are consistent with the natural resource base. Clearly there is disagreement about what constitutes protection and at what level the protection is compromised by competing uses. It is in this area of disagreement where interpretation becomes important, and where mitigation is employed. NPS does not agree with or propose that laws or regulations should be half-met.

LETTER 60. SIERRA CLUB, BOZEMAN MT

COMMENT:

The Sierra Club wishes to reaffirm the previous decision, and supports the SEIS alternative 1a following the original timetable. We also wish to note that the current process has been a waste of taxpayer money (\$2.4 million) as more than 65,000 comments were submitted previously in support of the decision.

RESPONSE:

No response.

COMMENT:

Legal Framework: The Organic Act of 1916, the General Authorities Act, and Senate Report No. 95-528 (re. The Redwoods Act) reflect on the prevention and remedy for impairment, and the absolute authority and responsibility for NPS to act without derogation of the values and purposes for park establishment.

RESPONSE:

No response necessary.

LETTER 60. SIERRA CLUB, BOZEMAN MT	
COMMENT:	The Clean Air Act provides for prevention of significant deterioration of areas where air is cleaner than national ambient air quality standards, and for an affirmative responsibility by the federal land manager to protect air quality related values, including visibility. The act provides for prevention of future impairment and remedying any existing impairment on Class I federal areas – including YNP and GTNP.
RESPONSE:	No response necessary.
COMMENT:	Noise and Natural Quiet: We support the establishment of appropriate noise standards and comprehensive baseline sound-level monitoring and sound-source inventories of all protected areas.
RESPONSE:	No response necessary.
COMMENT:	The sounds and silences of nature are among the intrinsic elements that combine to form the natural environment. Noise from snowmobiles and air tour flights that disturb the peace are not normally appropriate in protected areas.
RESPONSE:	NPS agrees.
COMMENT:	Wildlife and Natural Resources: NPS regulation prohibits snowmobile use except where designated and only when use is consistent with the park’s natural, scenic....values, and will not disturb wildlife. Snowmobiles are inherently an inconsistent use, as disturbance is defined as “to interfere with, or destroy the tranquility or composure of wildlife.” Winter recreation can harm wildlife, as demonstrated in the SEIS.
RESPONSE:	No response.
VISITOR EXPERIENCE:	
COMMENT:	Many visitors feel snowmobiles dominate their visit to the parks. This causes many to stay away, negatively impacting the pool of people visiting the parks. Enjoyment of park resources and values by the people of the US is part of the fundamental purpose of all parks, however many forms of recreation enjoyed by the public do not require a national park setting and are more appropriate elsewhere.
RESPONSE:	The need for and expectation of quality park experiences is acknowledged in the FEIS and DSEIS. Part of the rationale for the existing decision is that there are other, nearby places for quality snowmobiling.

LETTER 60. SIERRA CLUB, BOZEMAN MT	
COMMENT:	NPS should follow its management policy at 8.2 relating to visitor experience: in part to encourage visitor activities that can be sustained without causing unacceptable impacts to park resources and values, and to not promote activities that do.
RESPONSE:	The decision to be made should provide rationale in terms of how law, regulation, and policy are met.
HUMAN HEALTH AND SAFETY:	
COMMENT:	NPS has a mandate to protect human health and safety as part of park purpose. In case of doubt about adverse impacts, NPS is to err on the side of protection.
RESPONSE:	There is no doubt that snowmobiles and their use are more harmful to human health and safety, in general, than snowcoaches and their use. Both forms of transport can be improved to be less harmful. Arriving at a determination where there are fewer, less polluting vehicles, in the hands of experienced, knowledgeable and concerned drivers, is the desired outcome of this process.
COMMENT:	Extensive discussion on public health and safety related to winter use was well covered in the FEIS.
RESPONSE:	No response necessary.
COMMENT:	Alternatives 1a and 1b would reduce emissions and sound to result in a direct major benefit to experiences of park visitors.
RESPONSE:	No response necessary.
COMMENT:	During 2001-2002, the largest numbers of citations ever recorded in one season were written. They occurred mostly in the West Yellowstone to Old Faithful corridor – and were issued mostly for speeding, careless driving, racing, driving without a license, and off-road travel. There was an increase in incidents with wildlife.
RESPONSE:	These are the conditions to avoid with a decision on winter use.

VISITOR USE AND ACCESS:	
COMMENT:	We support the use of snowcoaches as the sole mode of recreational travel on park roads in winter. These vehicles hold 10-15 people and provide opportunities on education by drivers, family sharing, and social interaction. The transportation system can be designed to allow individual trip planning and quiet periods, as well as other travel needs.
RESPONSE:	No response necessary.
COMMENT:	Similar transportation systems are in place or will soon be in place in other national parks: Denali, Grand Canyon, Zion and Yosemite.
RESPONSE:	NPS believes a mass transit oversnow access program is viable in these parks as has been shown elsewhere.
COMMENT:	Affordable access is a corner stone of our national park system. Though winter access is inherently more expensive than in summer, it can be demonstrated that snowcoach travel is significantly less expensive than snowmobile travel (calculation provided for a family of four). Further, if snowcoaches were used exclusively for access, the cost would decrease.
RESPONSE:	Better affordability of winter access is a continuing goal, as expressed in the existing decision.

LETTER 61. SIERRA CLUB, LOMA PRIETA CHAPTER, GUADALUPE REGIONAL GROUP	
COMMENT:	The use of motor driven snowmobiles is inherently incompatible with recreation enjoyed by other visitors. EPA-type air and noise pollution standards may be applicable to work environments and other daily activities, but not where people travel distances to seek nature, silence, and fresh air. We hope the trust of the people vested in the National Park Service will take precedence over the vested interests of a minority.
RESPONSE:	NPS' analysis shows this incompatibility. A number of alternatives have been considered throughout this process to address this. The existing decision resolved the conflict in a way that also greatly reduced the impacts of motorized use on park resources while allowing access for those who wish to continue to enjoy them.

LETTER 62. SIERRA CLUB, EASTERN IDAHO GROUP

COMMENT:

The more this issue is studied, the clearer it becomes that NPS must heed the best science, the law, its own charter, and the vast public opinion that wants the parks to be free of snowmobiles. Industry's "cleaner and quieter" machines are not clean and quiet. The SEIS shows that the original decision was appropriate. NPS cannot justify allowing snowmobiles to remain, fouling the air with emissions and stripping away the peace and tranquility that a visitor to the park should be allowed to experience.

RESPONSE:

No response necessary.

COMMENT:

Carrying capacity: NPS must meet its mandate and perform a carrying capacity analysis to ensure resources and values are not compromised by current levels of winter use.

RESPONSE:

The existing decision takes the mandated first step to remove the source of impairment and mitigate adverse impacts. The decision also states that a carrying capacity analysis would ensue. SEIS alternative 2 would keep use at historic daily levels while initiating a carrying capacity study. SEIS alternative 3 would reduce snowmobile numbers on the corridor segments where most current impacts occur and then monitor the impacts of that use. Numbers and types of machines would then vary in accordance with adaptive management standards.

COMMENT:

Visitor experience: Visitor experience data collected in the parks traditionally has centered on interviewing snowmobilers. The truth is that there are hordes of us who will never step foot in the parks under current winter use conditions. NPS should not rely on survey results, and should rely instead on consequences to other critical resource and values.

RESPONSE:

NPS has made this case in the existing decision. The visitor experience analysis does not rely solely on the winter user survey. A national survey was also conducted, and results are reported in the EIS. NPS believes a new winter experience can be successfully marketed to the benefit of the park, park resources and the economy.

COMMENT:

Air quality: the writer enumerates and explains the various mandates regarding air quality. Because of increased snowmobile use, the amount of harmful pollutants, and because snowmobiles are unregulated, NPS must mitigate or eliminate impacts to air quality. Converting winter recreation travel [to snowcoach only] would achieve this.

RESPONSE:

NPS has made this case in the existing decision.

LETTER 62. SIERRA CLUB, EASTERN IDAHO GROUP
<p>COMMENT:</p> <p>Noise pollution: the writer enumerates and explains the various mandates, NPS policies, studies, reports and other sources addressing issues of noise in national parks. Snowmobile noise has led to inescapable noise throughout YNP, GTNP and JDRP. The effect is to stress winter-worn wildlife and, to other visitors, the loss of the stillness, solitude, and natural quiet that they came to enjoy. Any alternative to allow snowmobiles will be in violation of NPS' own policies.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>

LETTER 63. THE UNIVERSITY PHYSICIANS TOXIC EXPOSURE CLINIC, UNIVERSITY OF ARIZONA
<p>COMMENT:</p> <p>As a physician, I have treated many individuals who have respiratory illnesses and asthma caused by pollutants such as those produced by snowmobile engines. Due to the nature of these pollutants, the continued use of snowmobiles jeopardizes the health of park employees forced to inhale exhaust. Scientific studies demonstrate the following: Airborne particulates and other pollutants generated by internal combustion are associated with excess cardiovascular and respiratory illness and increased mortality</p>
<p>RESPONSE:</p> <p>NPS incorporated the results of a 2001 study by Kado, et al., examining environmental and occupational exposure to toxic air pollutants from snowmobiles.</p>
<p>COMMENT:</p> <p>Vehicle exhaust is linked to asthma and other respiratory symptoms.</p>
<p>RESPONSE:</p> <p>See response to comment 1.</p>
<p>COMMENT:</p> <p>Pollutants produced by snowmobiles cause both acute and adverse respiratory effects and chronic effects. These pollutants consist of particulates that are of a respirable size that can reach deep into the lungs, nitrogen oxides, acid aerosols, and carbon monoxide, and are verified health risks.</p>
<p>RESPONSE:</p> <p>See response to comment 1.</p>
<p>COMMENT:</p> <p>Due to the fact that large numbers of snowmobiles are sources of large quantities of respiratory pollutants and toxins, it is not medically reasonable to allow your employees to be continually exposed, nor is it wise to require respirator use when the pollutant source can be removed.</p>

<p align="center">LETTER 63. THE UNIVERSITY PHYSICIANS TOXIC EXPOSURE CLINIC, UNIVERSITY OF ARIZONA</p>
<p>RESPONSE: NPS agrees.</p>
<p>COMMENT: Banning snowmobiles, especially at West Yellowstone, appears to be a medical necessity for the health of some park employees.</p>
<p>RESPONSE: The existing decision would perform this function.</p>
<p>COMMENT: The American Thoracic Society considers adverse health effect of pollutants to include respiratory symptoms, decreased health-related quality of life, decrements in lung function, and detectable clinical effects.</p>
<p>RESPONSE: See response to comment 1.</p>

<p align="center">LETTER 64. THE WILDERNESS SOCIETY NORTHERN ROCKIES REGIONAL OFFICE, BOZEMAN MT</p>
<p>COMMENT: The Wilderness Society supports alternative 1a, which would implement the decision in the November, 2000, ROD. The Wilderness Society recognizes that the economic analysis in the DSEIS failed to consider several positive benefits of implementing a public transportation system.</p>
<p>RESPONSE: No response necessary.</p>
<p>COMMENT: The positive impacts of the change to mass transit will outweigh any negative impacts, especially over the long term. By protecting the quality of the parks' natural amenities, the change in the form of winter access will strengthen important forces driving the growth and development of local and regional economies. Based on experiences with previous events that affected winter and summer visitation of the parks, local economies can adjust to the change by seek new opportunities. Any reduction in sales and jobs associated with the change can be offset by increased sales and jobs associate with increased use of snowcoaches in the parks and continued snowmobile access to the lands surrounding them. Negative impacts will be limited in scope and duration. The natural increase in visitor spending over just one year will roughly match the reduced spending associated with the change. Local review does not track visitation levels in the parks.</p>

<p align="center">LETTER 64. THE WILDERNESS SOCIETY NORTHERN ROCKIES REGIONAL OFFICE, BOZEMAN MT</p>
<p>RESPONSE:</p> <p>The comment restates rationale that exists in the present decision document. Many local business advocates do not subscribe to this view. Comments from the Town of West Yellowstone, and from a number of residents in the town, appear to recognize the need for change and the opportunity that change represents diversify the economy. Others view any change from the status quo, regarding snowmobile use, as detrimental or devastating.</p>
<p>COMMENT:</p> <p>Steps can be taken to maximize the positive economic impacts of the change and to minimize any negative impacts. The interested parties must develop a coordinated advertising effort that includes the parks, concessioners, tourism boards, and local businesses. NPS should involve the gateway communities in developing the transportation plan to implement the mass transit alternative. NPS should pursue funding from other sources (e.g., Congressional and NPS funds, T-21 funds, Federal Highway Administration and Federal Transit System funds) to develop and implement the snowcoach system.</p>
<p>RESPONSE:</p> <p>NPS notes that all these steps are easily inferred from measures contained in the existing decision. Following the decision, a joint marketing study aimed at a new winter experience was initiated, involving NPS, local governments, the business community, the conservation community, state tourism boards, and concessionaires. Also, seed funding for marketing was approved, and a snowcoach development initiative was put underway.</p>

<p align="center">LETTER 65. WILDLANDS CENTER FOR PREVENTING ROADS</p>
<p>COMMENT:</p> <p>Given higher standards of protection for national parks, and these parks in particular, articulated in federal law and regulation and NPS policy, and given the magnitude and severity of the environmental impacts and user conflicts caused by snowmobiles, eliminating recreational use of snowmobiles is the only legal policy action.</p>
<p>RESPONSE:</p> <p>This was the finding in the existing decision. The rule implementing the decision states that snowmobiles could only be reintroduced if there were strict limitations placed on them. Limitations can be applied in all the following areas: significant reduction in numbers to be allowed; types of machines limited to cleaner and quieter varieties deemed acceptable to NPS (BAT); other measures needed to eliminate harassment of wildlife, such as guided tours only.</p>
<p>COMMENT:</p> <p>In addition to supporting NPS' general direction on this issue, and strongly encouraging the agency to hold the course with its plan to phase out snowmobile use, we want to express two major concerns with the plan. The length of the phase-out period is excessive. NPS is well aware that snowmobile use does not belong in the park – so the transition should be expedited to ensure maximum compliance with NPS' governing legal duties to protect park resources. The benefits to resources and values themselves are evident by this course of action.</p>

LETTER 65. WILDLANDS CENTER FOR PREVENTING ROADS
<p>RESPONSE:</p> <p>If appropriate measures are identified to eliminate impairment and adverse impacts, as in the existing decision, sufficient time must be allowed in which to implement those measures effectively.</p>
<p>COMMENT:</p> <p>While the existing decision is clearly an improvement over current management, it is still inadequate to meet the agency's legal obligations. The NPS has no legal obligation to provide winter motorized access. A minimal level of recreation access to the parks, consistent with protecting the serenity and quiet, the wildlife, and other environmental values, may be acceptable. However, use of snowcoaches on groomed routes throughout the park still has significant adverse effects on the parks' ecosystems and wildlife. These impacts are fully articulated and cited in numerous documents (cited) submitted by CPR, which we hereby incorporate along with all supporting information, into this comment letter.</p>
<p>RESPONSE:</p> <p>There are opposing views in the scientific community regarding the effects of grooming by itself. The opposing views are disclosed in the FEIS (see responses to Schubert comments) in accordance with CEQ regulations. Population-level effects have not been demonstrated conclusively, and they have not been dismissed.</p>
<p>COMMENT:</p> <p>We also support and incorporate by reference the comment letter on the SEIS submitted by the Southern Rockies Forest Network (Southern Rockies Ecosystem Project).</p>
<p>RESPONSE:</p> <p>The Southern Rockies Forest Network is a coalition of 26 conservation and recreation groups. The letter is listed in this document as American Lands Alliance, et al. See NPS responses to this letter.</p>

LETTER 66. WILD THINGS UNLIMITED, BOZEMAN MT
<p>COMMENT:</p> <p>From December 21, 2001, through March 5, 2002, this organization conducted a film project to document human-wildlife interactions in Yellowstone National Park. Two observers were in the field for a total of 59 days monitoring and filming wildlife and human activity along the road system in the southwestern portion of the park. Resulting data are reported:</p>
<p>RESPONSE:</p> <p>The study will be reported in the FSEIS.</p>
<p>COMMENT:</p> <p>88 negative interactions (defined as human activities causing a significant disruption of an animal's behavior) occurred during the observations. The negative interactions included animals running away, animals jumping over the roadside snow berm or otherwise moving from the road into deep snow, animals that stopped feeding, and animals becoming agitated or alarmed.</p>

LETTER 66. WILD THINGS UNLIMITED, BOZEMAN MT	
RESPONSE:	See response to initial comment in this letter.
COMMENT:	Of the 88 incidents, 63 involved snowmobiles, 27 involved snowcoaches, and 2 involved people on foot who had climbed off of snowmobiles. There was overlap with some incidents involving snowmobiles and snowcoaches. Of the negative interactions, 70% resulted from snowmobile activity, 29.98% resulted from snowcoach activity, and .02% resulted from humans on foot.
RESPONSE:	See response to initial comment in this letter.
COMMENT:	Extrapolating the data from how frequent the negative interactions occurred during the observation periods, during a 79-day season, there would be 622 negative interactions between humans and wildlife.
RESPONSE:	See response to initial comment in this letter.
COMMENT:	Human behaviors that were observed during the negative interactions included: making inappropriate passes of animals resulting in spooking of animals, chasing or herding animals, stopping less than 25 meters from animals, throwing snowballs at animals, and bison movement halted due to blocked road. One snowmobile user was observed trying to pet a bison as she passed the animal.
RESPONSE:	See response to initial comment in this letter.

LETTER 67. WOMEN'S VOICES FOR THE EARTH	
COMMENT:	The primary concern is with the lack of detailed discussion and analysis of human health effects from criteria and hazardous air pollutants in the SEIS. Given the lack of details, the organization believes it can only support Alternative 1a, which shows a "clear improvement over the currently dismal health effects seen in the park."
RESPONSE:	NPS incorporated into the FSEIS the results of a 2001 study by Kado, et al., examining environmental and occupational exposure to toxic air pollutants from snowmobiles.
COMMENT:	Concern that alternatives 1b, 2, and 3 will exceed national and state ambient air quality standards for CO, PM.

LETTER 67. WOMEN’S VOICES FOR THE EARTH	
RESPONSE:	No response.
COMMENT:	The SEIS needs more information on the negative health effects from PM, including increased mortality.
RESPONSE:	See response to initial comment in this letter.
COMMENT:	The SEIS needs to discuss and analyze not only NAAQS, but also toxic air pollutants such as benzene, formaldehyde, and other toxic chemicals emitted by snowmobiles.
RESPONSE:	See response to initial comment in this letter.
COMMENT:	The SEIS must discuss the “potential for synergism between the multiple chemicals” to which workers and visitors are exposed.
RESPONSE:	NPS believes there is no effective means for judging the synergistic effects of multiple toxics. Anecdotally, one could assume that the effects presented in the Kado report, or the symptoms that employees have presented with, are the result of a synergism of all the pollutants they are exposed to.
COMMENT:	NPS must be cautious in making its decision given the limited data about the potential long-term and chronic impacts of air pollutants.
RESPONSE:	The decision to be made must present rationale as to how allowable motorized use will be implemented in a way that protects visitor and employee health and safety.
COMMENT:	The comments included copies of “Selected Key Studies on Particulate Matter and Health: 1997-2001,” American Lung Association, dated March 5, 2001; “Lung Cancer, Cardiopulmonary Mortality, and Long-term Exposure to Fine Particulate Air Pollution,” C. Arden Pope, III, et al., Journal of American Medical Association, Vol. 287, No. 9 (March 6, 2002).
RESPONSE:	The attached literature will be reviewed, reported and cited as appropriate in the FSEIS.

LETTER 68. WYOMING OUTDOOR COUNCIL (WOC)	
COMMENT:	After thoughtful review of the supplemental analysis, we echo the concerns set forth by the Greater Yellowstone Coalition in its comment letter dated May 29, 2002, and incorporate its substantive comments by reference.
RESPONSE:	See GYC letter and NPS responses thereto.
COMMENT:	We ask the NPS to protect the wildlife, natural ecosystems, and beauty of GTNP and YNP by selecting alternative 1a as the preferred alternative.
RESPONSE:	No response necessary.

Individuals Generally Favoring Use of Snowmobiles in the Parks (11 Letters)

LETTER 69. GARY A. BAXTER, WEST YELLOWSTONE MT	
COMMENT:	All public lands are owned by all of us and should be accessible to everyone.
RESPONSE:	Park resources and values must be conserved and protected. When use by some visitors impacts these resources and values, including the opportunities for others to appreciate them, management must take action.
COMMENT:	There has been no proof of damage to the park or animals solely from the use of snowmobiles. There is a larger chance of animals darting out during the seasons that autos are allowed in these parks.
RESPONSE:	Wildlife is affected by snowmobile use, as disclosed in the FEIS and the SEIS. There is sufficient proof regarding the disclosed effects in literature and research suitably referenced in the documents.
COMMENT:	The Montana Department of Environmental Air has never recorded an EPA violation. Snowmobile renters have used Gasahol and synthetic oils to reduce pollutants.
RESPONSE:	Models used in the evaluation process are routinely used in regulatory actions by states and other agencies. The models predict violations of NAAQS standards given the number of vehicles that could use the parks in each DSEIS alternative scenario. NPS should not implement actions that predictably violate air quality standards. Further, NPS is charged with maintaining the best possible air quality in these parks – such a mandate means that air should not be polluted at all, let alone approach a standard that would indicate highly polluted air.
COMMENT:	Snowmobiles are patrolled more than any other group and ticketed more than autos. Park rangers unfairly target snowmobilers in enforcing regulations.
RESPONSE:	There is no evidence for this statement. Park rangers issue violations or warnings whenever they observe an infraction. The snowmobile advocacy community seems to be wholeheartedly in support of more enforcement and stricter provisions if it will allow snowmobiles to remain in the parks.
COMMENT:	Until a dependable snowcoach is developed it should not be a recommended form of travel. To go to all snowcoach travel, we must be able to respond to a mass accident involving 20-60 people. Costs on snowcoaches would be prohibitive to the general public unless the costs are partially funded by the NPS.

LETTER 69. GARY A. BAXTER, WEST YELLOWSTONE MT
<p>RESPONSE:</p> <p>Snowcoach travel is dependable, given due care of the owner/operator. It has been a feature of access into the parks for as long as snowmobiles have been routine modes of winter recreation travel. The means is available to provide all necessary support for snowcoach travel, including the contingencies of accidents and breakdowns. The support is seemingly more straightforward for snowcoach travel than it is for the volume, speed, inexperienced drivership, and present lack of control on snowmobile traffic within the park. NPS believes that the cost of snowcoach travel can be significantly less than the cost of a rental snowmobile and related expenses.</p>

LETTER 70. ROBERT L. BERGER, LYNNWOOD WA
<p>COMMENT:</p> <p>Allow snowmobiles that meet the emissions standards proposed in Alternative 3. Industry is moving that way. By imposing such standards for the parks, NPS will be encouraging them to move even faster.</p>
<p>RESPONSE:</p> <p>No response.</p>
<p>COMMENT:</p> <p>Do not require guides to accompany snowmobiles in the parks. They would accomplish nothing significant that can't be done through education and law enforcement.</p>
<p>RESPONSE:</p> <p>NPS believes that a requirement for guided tours only serves a variety of useful purposes, including education and compliance with regulations. For example, it is the only means in NPS' authority by which to ensure the use of cleaner and quieter snowmobile technology in the parks.</p>
<p>COMMENT:</p> <p>To the extent that a market exists for it, encourage development of a snowcoach based, city-style bus, winter mass transit system that competes with snowmobiles in both convenience and user cost.</p>
<p>RESPONSE:</p> <p>No response.</p>
<p>COMMENT:</p> <p>Vehicle engine emissions: the DSEIS makes a good case for banning all vehicles using engine technologies currently employed in most snowmobiles. 2-cycle engines as a class should not be banned; there would be no reason to ban those that meet the Alternative 3 emission standards, just as there would be no reason to allow in 4-cycle engines that don't.</p>
<p>RESPONSE:</p> <p>No response.</p>

LETTER 70. ROBERT L. BERGER, LYNNWOOD WA

COMMENT:

Natural Soundscapes – Noise Level Modeling: The noise level modeling is seriously flawed because they do not provide a real world comparison of the four alternatives. Reasons: Alternatives 1a and b utilize expected daily visitation, while 2 and 3 represent the maximum allowable usage; vehicles allocated to each road segment are assumed to be randomly distributed – which is not valid; and the model assumes that snowmobiles at all times are traveling at the speed limit or take into account the impact on average speed by Yellowstone’s famous bison jams and other distractions.

RESPONSE:

Alternatives 1a and 1b use various assumptions to assure that historical visitation is accommodated by mass transit vehicles through the season. Alternatives 2 and 3 assume daily caps in snowmobile use at or below the total annual visitation level at West Entrance and higher at other entrances. The only reasonable assumption for these use scenarios is that the cap will be hit most of the time to even out use in lieu of peak days. Clearly, communities and businesses tend to market in order to maximize use. Since there has to date been no cap, use has tended to grow as a result over time. Witness the growth in the hotel/motel industry of West Yellowstone. There is reason to believe that the snowmobile tourism industry will attempt to fill to capacity all the allowable use that is offered. Any assumptions made about speed or delay would likely complicate the model and provide more fodder for criticism and disagreement. Such assumptions about model inputs are the same for both snowmobiling alternatives, therefore there is no modeling bias introduced.

COMMENT:

The letter presents 6 pages of page-specific comments, questions, concerns and conclusions.

RESPONSE:

The specific comments have been reviewed and considered. Those that apply to information in the final document will be further considered and addressed.

**LETTER 71. SEAN BLACKLOCKE,
INDEPENDENT ENVIRONMENTAL CONSULTANT, WASHINGTON, DC**

COMMENT:

Comments submitted on behalf of suppliers and consumers of snowmobiles and snowmobile services in the Greater Yellowstone Area. Request NPS consider and respond to three proceeded sections of comment before making a decision.

RESPONSE:

No response.

COMMENT:

Understanding the Rationale for the Proposed Snowmobile Ban: NPS claims that the feasibility of the adoption of “clean and quiet” standards for manufacture and operation of snowmobiles is too uncertain to assure prevention of “impairment” to “park resources and values”, particularly with respect to air quality. Quoting Glen Loomis, For this reason many of the conclusions are driven by jumping from a perceived problem to simply banning snowmobiles. NEPA clearly requires consideration of mitigation of impacts. This should be done before establishing specific limits or banning certain activities.

<p align="center">LETTER 71. SEAN BLACKLOCKE, INDEPENDENT ENVIRONMENTAL CONSULTANT, WASHINGTON, DC</p>
<p>RESPONSE:</p> <p>Not all impacts are solved by “clean and quiet” snowmobiles. Though machines may be cleaner and quieter, they are not clean and quiet. Also, new generation snowmobiles do not address wildlife impacts and may even exacerbate them. NEPA regulations have been met, since numerous alternatives and mitigation measures were considered in the FEIS before the decision was made. Establishing limits and banning activities or closing some areas to use <u>are</u> measures that would mitigate the impacts of snowmobiles.</p>
<p>COMMENT:</p> <p>Critical Analysis of the Rationale for the Proposed Snowmobile Ban: Many of the words used by NPS to support its rationale are open interpretations of highly subjective terms. Clearly there is no direct or indirect absolute mandate to ban snowmobile use in the interim or in perpetuity. NPS has arguably advanced its “environmentally preferred alternative” thus far in the absence of its cost-benefit analysis requirements under NEPA and E.O. 12866 – Regulatory Planning and Review. Though NPS is not required to select the alternative that “maximizes net benefits, it is required to exhaust every reasonable opportunity to arrive a relative net benefit estimates for each alternative and provide a clear explanation of why, if applicable, it was not selected.</p>
<p>RESPONSE:</p> <p>Referring to CEQ regulations, 40 CFR 1502.23, a cost-benefit analysis need only be prepared if it is relevant to the choice among environmentally different alternatives being considered for the proposed action. Further, the preparation of such a study would need to include consideration of unquantified environmental impacts, values and amenities, though they need not be expressed in monetary terms. As a minimum, an EIS should at least indicate those considerations, including factors not relating to environmental quality, which are likely to be relevant and important to a decision. The FEIS duly performed this function, and it provided in an appendix an analysis of the costs of all alternatives. Alternative G – snowcoach only access – was among the least costly alternatives, while it demonstrably would have the greatest environmental benefit. All indications from SEIS alternatives are that alternatives 2 and 3 would be more costly and have fewer environmental benefits.</p>
<p>COMMENT:</p> <p>Suggestions for Supplemental Analyses: Net benefits estimates for all alternatives and a new comprehensive community-level, rather than county-level economic impact analysis. [Writer suggests specific procedural steps to follow.] Should NPS fail to perform these analyses, a daily use cap of 900 snowmobile visitors under Alternative 2 would be a significant compromise in use rights on the part of snowmobile and snowmobile service suppliers and consumers in the GYA.</p>
<p>RESPONSE:</p> <p>In any case, a cost-benefit analysis would not include costs and benefits to communities. Such an analysis might be something a Cooperating Agency (county) would perform. In the context of winter use, such an analysis would consist of the cost to government of implementing alternatives versus the receipts or other benefits, including environmental benefits as discussed above, to government. A daily cap of 900 visitors can be seen as having potential for a significant growth in use and as such does not represent any sort of compromise.</p>

LETTER 72. MATT BURKHART, LARAMIE WY

COMMENT:

I have seen no conclusive evidence to show that snowmobile use of these parks is rendering them “unimpaired for future generations.” Having been a passenger in a snowcoach, I can attest to the fact that it is not a pleasurable experience. A snowmobile guide should not be required. The NPS should use the study completed by the state of Wyoming with respect to snowcoach emissions as the best available science for making management decisions.

RESPONSE:

It falls to a decision maker to make a finding of impairment. In this case, the regional director reviewed impacts disclosed in the FEIS and determined, with recommendations by park leadership, that the cumulative impacts of noise, emissions, and numbers and behaviors of snowmobilers impair park resources and values. We are informed by a number of other people that their snowcoach rides have been enjoyable. The State of Wyoming is a party to the advocacy of snowmobile use, finding it helpful in these circumstances to emphasize perceived inadequacies of snowcoaches. NPS points out that the purpose of the SEIS is to evaluate the benefits of new snowmobile technology, and how they may mitigate impacts associated with present snowmobile use. The attack on snowcoaches is diversionary, especially considering that NPS is on record in the existing decision regarding snowcoach inadequacies and expresses its intent to improve them.

COMMENT:

I do not feel that snowmobile sound from a stock exhaust system is considered noise. The EPA should be the governing body for emissions requirements in the parks. The public is generally misinformed about snowmobile use in Yellowstone – use occurs on designated trails – not unlimited off-trail travel. Noise can be heard in only 6.5% of the parks – there is already enough area for those who enjoy no sound at all. Nonmotorized users of thermal and wildlife areas should be required to stay on designated trails to minimize impacts to wildlife.

RESPONSE:

By definition, unnatural sound of the type generated by snowmobiles and snowcoaches, is noise. The EPA is not jurisdictionally in charge of national parks. NPS has the authority and responsibility to regulate uses in the parks, including the ability to say what kind of vehicles may enter, and to protect resources of which air quality is one. NPS has no authority to regulate emissions for industry’s nationwide production and distribution. The EIS is very clear about where snowmobiles have been allowed to travel. It is also very clear that snowmobile sound travels far beyond the roads where sound is generated. Areas and winter trails accessible to most winter visitors, including those who expect solitude and quiet, are impacted by the sound of snowmobiles. Nonmotorized users of critical winter wildlife habitat, such as thermal areas, are required to stay on designated trails to minimize impacts to wildlife. By virtue of the existing decision, some areas are closed to nonmotorized use in order to eliminate its impact on wildlife.

COMMENT:

A nonmotorized and snowcoach only access at the beginning of the winter season allows these users to enjoy the park. A similar season at the end, possibly in April, could be appropriate as well.

LETTER 72. MATT BURKHART, LARAMIE WY
<p>RESPONSE:</p> <p>An appropriate nonmotorized winter experience would not be afforded at these times, on the average, due to lack of snow. It would be the same as presently offered before park closure in the late fall, or in the early spring before the park is opened.</p>

LETTER 73. KIM AND JOYCE CHILDS, IDAHO FALLS ID
<p>COMMENT:</p> <p>We are seriously concerned about the severe impacts that 2-cycle machines have on YNP and other parks. We are professional people who engage mostly in non-motor types of recreation. We have tested both snowmobiles and snowcoaches for winter access into Yellowstone.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>Bombardier snowcoaches are a poor way to see the park and should be removed from use. The modern vans with rubber tracks look like an acceptable way to see the park and avoid most of the disadvantages of the Bombardier. During the snowcoach trip we snowshoed in the Old Faithful area for several hours on two different days. We continually heard the annoying whine of snowmachines and smelled their exhaust when over a mile away from the developed area. This is unacceptable.</p>
<p>RESPONSE:</p> <p>The existing decision phases out snowcoaches that do not meet standards. NPS has stated its intent to facilitate the development of a new generation snowcoach, while requiring in the interim the use of best available technology, such as that provided by rubber tracked vans.</p>
<p>COMMENT:</p> <p>This past winter we rented two different types of 4-stroke snowmachines for a 3-day trip on the same route as we took before. These machines are quieter than new 2-stroke machines, even though they are clearly excessively noisy. Despite the insulated helmets, the noise made our ears ring all night. The 4-stroke machine emissions, based on smell alone, were relatively unnoticeable compared to the 2-strokes. Following the latter is absolutely nauseating even with moderate crosswinds and falling snow. The entire town of West Yellowstone was covered with a blue cloud of exhaust when we started our trip at noon. The noise of machines was deafening. We can now understand why park rangers need respirators.</p>
<p>RESPONSE:</p> <p>NPS appreciates the acknowledgement.</p>
<p>COMMENT:</p> <p>Snowmobiles do afford ideal sightseeing as you travel in the park, but if and only if they are quiet, clean, 4-stroke machines. Current 4-stroke machines are not quiet enough. Low emissions are essential to protect air quality. Even if air quality is poor only near the roads, that is unacceptable because that is where all the people are. Nearby wildlife are exposed as well.</p>

LETTER 73. KIM AND JOYCE CHILDS, IDAHO FALLS ID

RESPONSE:

Cleaner and quieter snowmobiles solve some problems, but not all. A key issue is the number of snowmobiles to be allowed – the benefits of cleaner and quieter machines are all but eliminated if more machines are allowed. If emissions and noise are to be reduced significantly, there must be fewer machines allowed.

COMMENT:

We have reviewed the SEIS and find it very difficult to draw desired comparative information from it. A large issue in the EIS is the impact to communities. The communities have benefited for years from an activity that was obviously damaging to the park and human health, yet they did nothing to promote healthy change. Protecting the park should be a priority and communities have no one to blame but themselves if they suffer. They need to change to protect the park long-term.

RESPONSE:

NPS is in agreement that communities can benefit from diversifying, or placing less emphasis on snowmobiles as the only way to see Yellowstone. Impacts and alternative features are put in comparative form in the SEIS (Chapter II).

COMMENT:

Conclusions: Do not require guides. 2-stroke machines should be banned immediately. Bombardier snowcoaches should be eliminated immediately. Modern rubber-tracked vans should be allowed, as in the current policy. State of the art 4-stroke machines should be allowed once they are about an order of magnitude quieter than this year's models. Increasingly strict emissions, mileage, and noise standards should be applied over a reasonable time frame. Visitor numbers should not be limited unless unbiased scientific studies show significant impacts. If visitor numbers become excessive in the future, a shuttle system would be a viable option to personal vehicles in peak periods. Existing speed limits should be strictly enforced. The park budget should increase immediately by a factor of at least two.

RESPONSE:

Guides under permit represent the only means NPS has to ensure that cleaner and quieter machines enter the parks. Guides-only also mitigates impacts on wildlife, and reduces enforcement needs. Snowcoaches – see response 2, above. NPS' intent is to ensure the use of best available technology over time, which implies there is a need to provide incentives for improvement. There is no intent at this time to limit visitor numbers. There is a need to limit visitation by snowmobile, and replace it with snowcoach use. Park budgets have not increased to deal with winter use issues. This is one reason parks are concerned about reliance on adaptive management to address issues: adaptive management is a costly practice, and it would require a significant increase in the budget for each park.

LETTER 74. CAROL AND JERRY DICKINSON, ROCK SPRINGS WY**COMMENT:**

The social experience is the selling feature of the snowcoach ride. The Mattrack coach does not promote social interaction, as does the Bombardier. There are no roof hatches through which one can take photos. When conditions are poor, a good driver can finesse a Bombardier through moguls and provide a tolerable ride. What will you do to make the snowcoach ride between Colter Bay and Flagg Ranch interesting? It's already a long boring ride. It would be a shame if the money flow slows to the point where the winter infrastructure cannot be financed with only snowcoaches. We urge you to research the options of improving the emissions of the Bombardiers or modifying the converted highway rigs so that the social experience or quality of ride is not lost.

RESPONSE:

NPS has been facilitating research and development for a new generation snowcoach. The characteristics of snowcoach travel noted in this comment are criteria being included in the new snowcoach concept. NPS holds that there is a certain amount of necessity in terminating the plowing of the road from Colter Bay to Flagg Ranch. Apart from necessity, numerous benefits to resources and visitor experience accrue to this measure – whether access is via snowcoach only, or otherwise. Finally, Flagg Ranch would become an oversnow destination. People need not, although they may, ride a snowcoach all the way to Old Faithful from Colter Bay. Cooperating agencies and others have often recommended opening new destinations in the park interior to disperse use. Flagg Ranch as an oversnow destination would become such a facility.

**LETTER 75. DOUGLAS EDGERTON AND JERRY JOHNSON,
WEST YELLOWSTONE MT**

COMMENT:

A fixed number of snowmobiles will be too low and the transition too fast for local economies to adapt. We propose a model in which snowmobile numbers are reduced on a ratio that is based on a corresponding increase in snowcoach visitation. In this model, the NPS will have to make a new snowcoach a reality and help promote mass transit. The local communities will have to rent only 4-stroke snowmobiles and actively promote mass transit. The snowmobile industry will have to certify certain models of snowmobiles at a 75% emission reduction.

RESPONSE:

NPS does not need an incentive to make a new generation snowcoach a reality. The choice being considered here comes down to which needs immediate attention: protection of park resources, values and experiences, or prevention of significant changes in local community businesses. NPS mandates and policies are very clear on this issue. Given the demonstrated level of adverse impact and impairment from snowmobiles, and current amounts of use, there must be strict restrictions on snowmobiles as a starting point. Strict restrictions on noise and emissions are not sufficient in addressing all impacts of snowmobiles. Wildlife issues, safety issues, and some visitor experience issues remain even if all snowmobiles entering the parks are cleaner and quieter.

LETTER 76. JEFF GUENGERICH, GARDINER MT

COMMENT:

Pollution statistics from Yellowstone do not take into account the overall emissions/air quality of the whole Yellowstone area during the winter. Emissions are tested at high peak travel times and at high peak areas. One does not need a high performance sled to visit Yellowstone. Increased numbers of snowcoaches will have an impact on trail conditions and require increased grooming. A daily cap on the amount of traffic, both snowcoaches and snowmobiles, will assist in controlling trail conditions.

RESPONSE:

Impacts must be noted wherever and whenever they occur in the parks. Emissions and other impacts may be most acute where snowmobiles congregate, such as West Entrance, Flagg Ranch, and Old Faithful, but impacts also occur along travel corridors. Overall air quality in an area that is to be managed for the best air quality possible must account for specific areas in which air quality is degraded. NPS recognizes the need to improve snowcoach technology. Even so, overall, the least impacting mode of access – given the level of visitation – is by snowcoach. NPS points out that large numbers of snowmobiles can also damage trail conditions.

LETTER 77. M.B. JOHNSON

COMMENT:

None of the options you offer are acceptable. What modifications could you make to entry booth toll areas to control fumes for workers? What about positive air pressure for the booths? What about an automatic pass system for entry? You do not have the right to destroy the livelihood of West Yellowstone in an arbitrary manner. Why eliminate cleaner and quieter snowmobiles? Do not use public opinion to make your decision – use science. Will more snowmobiles be allowed in than the average daily limit when emissions are reduced? One snowcoach equals eight cars because of the fuel inefficiency. Animals are harassed more in the summer than the winter because of the numbers of people. It would helpful to require a little training for park visitors to help them know how to respond when encountering buffalo on the roads.

RESPONSE:

The existing decision to eliminate recreation snowmobile use from the parks is not arbitrary. The decision was well considered, and the rationale for it was suitably presented in the record of decision. Before the decision was made, numerous contingencies and management practices were considered as alternatives in the FEIS, including improved snowmobile technology. Comparisons with summer use are inevitable, but in most cases they are an attempt to sidestep the very real impacts of snowmobile use. Animals are harassed in the summer, but the consequences of harassment of wildlife (intentional or not) in the winter are of greater concern because the animal's immediate survival may be at stake. The purpose of this EIS is to evaluate the impacts of winter use.

LETTER 78. FRANK B. ODASZ

COMMENT:

Bison do not panic and run away from snowmobiles. Snowmobile trails help bison move to food. Watching ravens unfasten the latched pouches on snowmobiles and eat lunches is a fascinating wintertime pleasure. Emission figures should take into account perpetual summertime road construction and bus and RV exhaust. Snowcoaches are uncomfortable and are too humid, resulting in frequent vigorous wiping of the window. Just one winter trip in Yellowstone will stimulate a deep respect for this especially awesome environment. Base daily limitations on scientific factors, including bison/human accidents and weather. Announce road closures at points 50-100 miles before park entrances so visitors can adjust plans. Expand recreational opportunities by building Snow Lodge equivalents at Canyon, West Thumb, and Fishing Bridge.

RESPONSE:

The commenter describes habituation behavior that is, in and of itself, an unacceptable impact on wildlife. Impacts of winter use are being evaluated. However, it may be pointed out that emissions from snowmobiles are in far greater proportion to their numbers, compared to all summer traffic. NPS is facilitating the development of a new generation snowcoach to improve emissions, noise, and visitor convenience. Many people could point out the discomforts of snowmobile travel as well. It would be appropriate to set user capacity on scientific parameters. At present, the view of many is not to have a cap at all, but to allow for current use plus some for growth. If roads are closed, NPS provides advance warning as a matter of course. It is not appropriate to consider expanded recreation opportunities of the sort mentioned until a decision about the amount and mode of access to be allowed is implemented.

Individuals That Generally Support the Existing Decision (18 Letters)**LETTER 79. DON BACHMAN, BOZEMAN MT****COMMENT:**

Once the decision to ban snowmobile use from YNP and GTNP is made, the monitoring program must be initiated and adaptive management adjustments made where warranted. I hope that NPS will insure that funding for these monitoring programs through a continuing line item appropriation. Concerned about the appropriateness of avalanche control activities on Sylvan Pass. I urge this program be monitored and that Sylvan Pass be considered for total closure to motorized use. Other elements of monitoring should consider the slower speed of snowcoaches.

RESPONSE:

The decision to be made must include all practicable means to avoid or minimize environmental harm, or explain why such measures are not included. The decision must include a monitoring and enforcement program to ensure the decision is implemented as appropriate and that intended results are achieved. Agencies must condition their actions based on funding and application of mitigation measures.

LETTER 80. MICHAEL C. BARENTI, SPOKANE WA**COMMENT:**

The SEIS should have identified a preferred alternative. One of the goals of NEPA is to allow the public an opportunity to comment on changes in environmental regulations. It is hard to analyze the impact either alternative will have on the two parks, as the SEIS gives the public no idea what type of visitor experience the Park Service is aiming for, and states no goals for desired noise levels, air quality, or wildlife protections. All we are told is that the NPS will conduct a study over the next three years and adjust snowmobile numbers to protect these still undefined qualities. This is unacceptable – the public needs to know specifics.

LETTER 80. MICHAEL C. BARENTI, SPOKANE WA

RESPONSE:

While not disregarding public needs, the CEQ regulations provide that an agency need not identify a preferred alternative in a draft EIS if it doesn't have one. The purpose of public comment is demonstrably to solicit comments on all alternatives, since all are being considered as a means of addressing the need for action. It is also true that when an agency designates a preferred alternative in a draft, comments tend to focus only on that alternative – pro or con. Nothing prohibits an agency from changing its preferred alternative between draft and final EIS. This is precisely the case in the previous process – wherein alternative B was the DEIS preferred, and alternative G was the FEIS preferred. Subsequent feedback from the public indicates that most did not recognize there were six alternatives besides the preferred.

COMMENT:

Alternatives 2 or 3 do not show how much an improvement in noise levels will occur. During a ski trip to the Canyon area, I could hear snowmobiles when I was more than three miles from any groomed road. The SEIS also fails to show that alternatives 2 or 3 will reduce wildlife harassment, and no information is given about what constitutes an appropriate number of incidents. The SEIS did not address the impact of illegal activities, especially off-road travel. How will NPS enforce emissions standards?

RESPONSE:

Clearly, snowcoach-only access results in the greatest improvement in soundscape quality. The DSEIS does show that, in contrast to the existing condition, reduced numbers of vehicles and administrative control over use will reduce the risk and incidence of harassment events. Alternative 3 reduces snowmobile numbers along the segments where the incidence and severity of harassment events is greatest. It also provides for access by guided tours only, which also reduces the risk of harassment. Alternative 2 would not reduce such risks relative to present conditions. There is no standard for the number of incidents that may occur without causing unacceptable impact. The function of adaptive management is to develop standards where there presently are none. Judging strictly by policy and other direction, any disturbance of wildlife appears to be unacceptable. It is the function of the EIS to disclose the magnitude, intensity and duration of impact, and the function of the decision to determine what is acceptable. There is no practical way to analyze illegal activities – NPS does not “manage” illegal activities so much as it manages uses. Illegal activities are terminated when possible, and violation notices and warnings are issued. The illegal activities that occur along with snowmobile use become relatively moot with the existing decision, although even in that instance trespass will undoubtedly still occur. The only means whereby NPS can enforce the use of certain types of machines e.g., cleaner and quieter snowmobiles, in the parks are by providing for all snowmobile access using an NPS permitted guide only. NPS cannot enforce emission standards, but it can control the types of vehicles that are allowed to enter the parks.

LETTER 81. BETSY BUFFINGTON, BOZEMAN MT

COMMENT:

The data and analysis regarding the impact that snowmobile use has on wildlife, air quality, human health, visitor experience, economics and the intent of our National Park System was thorough and impressive. One issue of critical interest to me is that of human health and air quality. I am one of the millions of people in the US who suffer from asthma. My experiences have led me to compare it to what I imagine it would be like to drown, slow or fast depending on the severity of the attack. I can no longer visit Yellowstone in the winter because of my reaction to snowmobile emissions. Last year, I visited Yellowstone via snowcoach having obtained a full stock of preventative medicine and a nebulizer. Use of these preparations prevented me from having an asthma attack, but for two weeks following my visit, I had about 50% of my normal lung capacity and little ability to project my voice.

RESPONSE:

NPS is very concerned about impacts of emissions on visitor and employee health. Many commenters argue that there is no need for regulation because the NAAQS standards have never been exceeded. This letter illustrates NPS' response, in that air quality in national parks should be much better than that which approaches the NAAQS standard. It is clearly not reasonable, nor consistent with law and policy, that someone with respiratory difficulties cannot visit a park due to extant air pollution.

COMMENTS:

NPS should consider or evaluate the following impacts.

It is not just those who suffer from asthma who may be affected, but people suffering from any kind of weakened immune system, pulmonary disorder and heart disease of any kind are at high risk for health problems when exposed to such pollutants. The elderly, the young, and women who are pregnant should not be exposed to such an environment. Is this the kind of future we want for Yellowstone?

CO emissions are of special concern. Lower, non-lethal doses can still cause serious impacts on an individual's health – by preventing the body from getting adequate oxygen. There is strong evidence (bibliography attached) of adverse health impacts at levels lower than the current EPA standard.

PM degrades air quality and visibility. PM₁₀ or smaller particles have been found to be strongly associated with increases in daily deaths and hospital admissions worldwide. Suspicions implicating PM₁₀ as a trigger to chronic lung disease are mounting

Though the snowmobile industry might argue that the effects are only seasonal, even short-term exposure is likely enough to contribute to early mortality of persons with asthma, COPD, or cardiovascular disease.

RESPONSE:

NPS incorporated into the FSEIS the results of a 2001 study by Kado, et al., examining environmental and occupational exposure to toxic air pollutants from snowmobiles.

LETTER 81. BETSY BUFFINGTON, BOZEMAN MT
<p>COMMENT:</p> <p>The writer provides a summary of literature (with bibliography) on a variety of other pollution factors associated with snowmobiles, including ozone, benzene, Nox, formaldehyde, 1,3 butadiene, and their documented health effects. She notes that their individual long-term effects have not been fully evaluated, and notes that of even greater concern might be the synergistic effects of all pollutants in the long term.</p>
<p>RESPONSE:</p> <p>Literature provided by Women for the Earth and discussions by Physicians for Social Responsibility and the Toxic Exposure Clinic have all been reviewed. Greater attention to health parameters will be provided in the FSEIS.</p>

LETTER 82. JIM CHAPMAN
<p>COMMENT:</p> <p>My preference is to stay with the existing decision to phase out snowmobiles by 2003-04. I want YNP and GTNP to be peaceful places in winter where bison, elk, and other wildlife are not harassed by noisy vehicles and their drivers. The air pollution snowmobiles cause is a big health hazard with NPS rangers who have to be there to let these machines in, being among the most affected.</p>
<p>RESPONSE:</p> <p>No response.</p>
<p>COMMENT:</p> <p>Make industry prove its statements about quieter and cleaner “new technology.” Set up a valid process to test them on adjacent national forest lands.</p>
<p>RESPONSE:</p> <p>Application of new technology must be a key feature in any post-decision monitoring.</p>
<p>COMMENT:</p> <p>In looking at table S-1, alternative 3 would allow as many as 1,130 “new technology snowmobiles per day at the start and the number could increase depending upon adaptive management conclusions. Over a 3 month period, that could total almost 102,000 snowmobiles, which is 50% higher (emphasis not added) than the average 66,000 that use Yellowstone today. This is too high. They need to cut back drastically at least to no more than 25% of the numbers proposed in table S-1. It is far easier to start out with low numbers and increase them than to start out with high numbers and suffer the political hassles when you have to lower them.</p>
<p>RESPONSE:</p> <p>If use occurs at the daily cap every day then overall seasonal use would dramatically increase. However, impacts that mostly occur during peak use days would be eliminated.</p>

LETTER 83. JEFFREY C. ERDOES, CARSON CITY NV
<p>COMMENT:</p> <p>Snowmobiling precludes traditional visitor enjoyment. Snowmobiling is not a traditional family activity, and is costly and difficult to control. Snowmobiles affect water and air quality, fauna, flora, and quiet.</p>
<p>RESPONSE:</p> <p>Impacts on visitor experience, air, wildlife and soundscape are disclosed in the DSEIS. Other impacts are discussed in the earlier FEIS, to which the SEIS is tied.</p>
<p>COMMENT:</p> <p>Presents a report, with illustrations of snowmobile damage, on snowmobile impacts on the Humboldt-Toiyabe National Forest.</p>
<p>RESPONSE:</p> <p>The photo documentation of impacts on the national forest is impressive. Most such impacts are not experienced in the parks, since legal snowmobile use occurs only on paved roads that are open to motorized travel during other times of the year. Illegal use, off the road, does not occur with anything near the frequency that off-trail use is allowed on the national forest.</p>

LETTER 84. STEVEN KRICHBAUM ET AL.
<p>COMMENT:</p> <p>We do not support any of the alternatives in the SEIS. We demand that the NPS immediately prohibit snowmobile and snowcoach use of the parks and terminate road packing/grooming activities. The NPS has violated federal law by failing to even consider a no-grooming alternative (which would maximize protection of wildlife, especially bison). A prohibition on road grooming will reduce the number of bison leaving Yellowstone in winter, reducing the number killed by the Montana Department of Livestock.</p>
<p>RESPONSE:</p> <p>See response to D.J. Schubert and the Fund for Animals. NPS has violated no law (presuming the commenter is referring to NEPA) in not considering a no-grooming alternative. For the winter use FEIS, NPS has the authority and responsibility to set the scope of analysis and the range of alternatives to be considered – albeit with input from the public. NPS considered, and elected to dismiss, a “no grooming – no motorized access” alternative. The impacts of groomed and packed surfaces by themselves are disclosed in the FEIS.</p>

LETTER 85. S. HELEN LABUN, PRINCETON NJ

COMMENT:

A careful review of the FEIS will show that the improvements in snowmobile design will not make any significant difference in snowmobilers' negative impact on wildlife....the new technology offers no real solution to the problems being experienced in today's mix of snowmobile use and wildlife habitat. Proposed carrying capacity studies delay implementation of any necessary snowmobile reductions, even given existing evidence of direct snowmobiler/wildlife conflicts, and so perpetuate the interim damages, a situation the drafters of the original FEIS specifically sought to avoid.

RESPONSE:

SEIS alternative 3 seeks to mitigate the impacts on wildlife by reducing snowmobile numbers in the area where most impacts occur, and by providing that snowmobiles would travel with an NPS permitted guide only. The decision to be made, if it is different from alternative 1a, must illustrate what the decision does to eliminate both impairment and adverse impacts on wildlife.

COMMENT:

NPS avoided impairment by balancing demands in its preferred alternative, Alternative G. The new snowmobile technologies do not reduce the area of noise audibility. Harassment of wildlife could decrease, even with a snowmobiler presence, if every visitor to the park, regardless of transportation preferences, behaved with an informed understanding of (and concern for) their actions' impacts.

RESPONSE:

This is, in part, the function of providing travel with the services of a professional guide. Most visitors who engage guide services express satisfaction with the experience. Knowledgeable guides provide information, interpretation and education. They assure the safest possible experience for novices. They know where to stop to enjoy unique features of the park, and they know how to respond to encounters with wildlife. Finally, if there is an infraction of the regulations, the guide is responsible under her/his permit.

COMMENT:

An implicit cost in Alternatives 2 and 3 is the diversion of NPS resources in snowmobiling programs... education programs instituted under the new alternatives instruct snowmobilers in trail etiquette, but also drain funds and employee work hours for a snowmobile-specific project of questionable efficacy.

LETTER 85. S. HELEN LABUN, PRINCETON NJ

RESPONSE:

Raising the issue of cost necessitates an important explanation. Park budgets have not increased to deal with winter use issues over time. This is one reason parks should be concerned about total reliance on adaptive management to address issues: adaptive management is a costly practice if it is done correctly, and it would require a significant increase in base funding for each park. Without an increase, either necessary monitoring and evaluation would not occur, or funds would be diverted from other park programs. The FEIS provided in an appendix an analysis of the costs of all alternatives. Alternative G – snowcoach only access – was among the least costly alternatives, while it demonstrably would have the greatest environmental benefit. All indications are that SEIS alternatives 2 and 3 would be more costly and have less environmental benefit. Adaptive management in alternative 2 would likely be more costly than in alternative 3. Also, the cost of a carrying capacity study on top of monitoring and adaptive management would not be insignificant. The heavy reliance on strict enforcement of regulations – having additional ranger staff and supporting equipment – occasions greater funding. Lastly, the imposition of reservation and permitting system or other means of implementing snowmobile programs in the two alternatives will require funds or willing partners to contribute funds and program assistance.

COMMENT:

76% of Yellowstone visitors come to view the scenery and wildlife, an experience that does not require snowmobiles.

RESPONSE:

No response necessary.

COMMENT:

The International Snowmobile Manufacturers Association challenges the FEIS decision by pointing to technological changes. These changes have no bearing on wildlife needs. Recent snowmobile changes have added nothing substantive to the debate. It was never appropriate to reopen the NPS' decision on Alternative G for the purpose of considering new alternatives that ignore the NPS' obligation on natural resource protection. This establishes a highly unsettling precedent for false compromise.

RESPONSE:

No response necessary.

LETTER 86. MICHAEL D. LEE, ST. CLOUD MN

COMMENT:

I participated in a study while in graduate school that looked at impacts on wildlife along a snowmobile trail. The study showed that great horned owls on eggs deserted nests near this snowmobile trail and white-tailed deer altered nocturnal movements and yarding behavior near the same trail.

RESPONSE:

Being unaware of the parameters of the study, NPS cannot apply this directly to its analysis in Yellowstone.

LETTER 87. NAME AND ADDRESS WITHHELD BY REQUEST

COMMENT:

NPS concurs with this request to withhold name and address, and accepts the comment. Pollution from snowmobiles have affected my personal health. People come to the region for clean air, not for blue haze. The biggest complaint I hear from my clients (on snowcoaches and snowmobiles) is the rough road conditions. These conditions can lead to accidents. Snowmobile noise is a problem, and new four stroke sleds are an improvement, but they are still louder than a Mattrack snowcoach and still very polluting. People shouldn't be allowed to snowmobile unguided. I have witnessed several snowmobiling accidents as a result of inexperienced drivers. Guided only would mitigate safety issues, insure compliance with park regulations, and prevent harassment of wildlife. Guided tours would also expand educational opportunities. Expand the motorized trail system outside the park to compensate for closing the park. The town of West Yellowstone should diversify its economic base and cater to additional markets.

RESPONSE:

NPS acknowledges a first-hand and credible account that supports its rationale in the existing decision, and short of that, rationale for key features of an alternative that would permit snowmobiles to be in the parks.

LETTER 88. JANNA S. RANKIN, ALTA WY

COMMENT:

Aldo Leopold and others wrote of the NPS' responsibility to husband resources, and to educate visitors to understand and appreciate the unique environmental setting represented by the park. Your legal and ethical mandate requires you to ban the snowmobiles and adopt alternative 1a. Risk-takers should be able to ride over the roads and trails outside West Yellowstone...and on other public lands. Our parks do not have to be all things to all people. As a custodian of public resources, you should promote intensive experiences rather than intensive use.

RESPONSE:

The purpose and need for action, supported by extensive presentation of NPS mandates and policies, is conveyed in Chapter I of the DSEIS. The decision must explain how selected actions are consistent with mandates.

LETTER 89. ALLEN REEL, ESQ, BEAVERTON OR

COMMENT:

Enclosed an article regarding the impact of snowmobile use on the environment and expressed concern over negative consequences from noise and air pollution. The article, "Dashing through the Snow: "Oregon and the Open Sleigh," which Mr. Reel wrote, was published in the Spring, 1973, volume of Environmental Law. Although nearly 30 years old, the article highlighted issues that remain relevant to the ongoing process for Yellowstone and Grand Teton National Parks, including:

- ❖ Sound exposure to users, non-users, wildlife
- ❖ Impacts from the use of snowmobiles – harassment of wildlife, access to and overuse of previously remote areas, snow compaction (vegetation/wildlife), sound (adverse consequences of habituation to the sound)
- ❖ The need for balanced restrictions on the use
- ❖ The 1971 Oregon law regulating snowmobile use.
- ❖ Snowmobile use on federal lands in Oregon considering NEPA and Executive Order 11644

RESPONSE:

The article is illuminating, expressing many of the same issues that are at the fore in this winter use planning process. The primary difference at this point is that the issues have grown more acute with greatly increased numbers of snowmobile users and greatly improved performance factors, perhaps other than those relating to noise and emissions.

LETTER 90. BOB SEIBERT, YELLOWSTONE NP, WEST DISTRICT RANGER

COMMENT:

The high numbers of snowmobiles proposed to access the park each day will insure that on most days, the roads will be very moguled and rough. We should rapidly reduce numbers to a level low enough to ensure that roads are smooth. To insure a successful transition to snowcoaches, we should provide an orderly descending cap on snowmobile numbers while we allow coach numbers to increase. Winter access through the East Entrance is expensive and dangerous. Relocating the staging point from Flagg Ranch to Colter Bay will increase the length and cost of a snowcoach ride. Once the conversion to snowcoach-only is complete, there is no need to close the park between the fall and winter seasons. Access could be by mass transit vehicle only during this time, controlled through concessionaires. Existing snowcoach technology is adequate to accommodate the original ROD.

RESPONSE:

No response necessary.

LETTER 91. RUTH SOLOMON, PRINCETON NJ

COMMENT:

The NPS should implement Alternative 1b to protect wildlife while allowing affected businesses more time to diversify or refocus their services. The Leopold Report of 1963 and the 2001 Management Policies promote maintaining parks in a natural condition. There are documented cases of increased stress in individual ungulates and wolves that are exposed to snowmobile traffic. Fecal glucocorticoid, a stress hormone, was found in elevated concentrations in elk near the busiest oversnow road. Wolf FGC level was also found to be higher in areas of heavy snowmobile use and activity. Ungulates along groomed snow routes were observed to have increased heart rates and elevated energy expenditures. While the use of snowcoaches will not eliminate the exposure of wildlife to motorized vehicles, the substantial decrease in the number of vehicles and the more predictable nature of snowcoach-wildlife interactions will reduce the stressfulness of the encounters. Even with an increased level of vigilance by park employees, wildlife harassment behaviors are unlikely to be eliminated. Snowcoaches will not eliminate wildlife conflicts but they offer the advantage of reduced traffic, more certain compliance with desired wildlife interaction guidelines, similar accessibility level, and greater predictability. While the need to change the long-term policy is clear, there does not seem to be an urgent need to eliminate snowmobiles immediately, therefore alternative 1b phases out snowmobiles appropriately.

RESPONSE:

Effects listed herein are described in the DSEIS, or in literature that is incorporated by reference.

LETTER 92. MARY TABER, YELLOWSTONE NATIONAL PARK

COMMENT:

I am concerned that each of the four alternatives presented in the document proposes opening Yellowstone to winter use during the month of November, a significant departure from current practice, in which the park is scheduled to open in mid-December. There is no information in the SEIS on what this change is in RESPONSE to, nor any analysis of impacts to local economies or natural resources. This change in opening dates constitutes a significant departure from the present practice, undoubtedly has impacts, and is not sufficiently analyzed in the SEIS.

RESPONSE:

The analysis will be reviewed and clarified as necessary. Alternative 2, crafted by the State of Wyoming, provides for early opening as an attempt to allow a season for snowcoach and nonmotorized winter experience in the parks before the snowmobile season. In practical terms, the time being allowed in this alternative is one in which there is normally insufficient snow to provide a winter experience.

COMMENT:

Was information received that indicates there is a socioeconomic demand for access to the park from mid-November to mid-December?

LETTER 92. MARY TABER, YELLOWSTONE NATIONAL PARK	
RESPONSE:	See response to comment 1. Attention to this question is provided in the FSEIS.
COMMENT:	What is the anticipated visitor use level for this period?
RESPONSE:	There is no data or set of assumptions provided by the proponents of this measure. However, attention to this question is provided in the FSEIS.
COMMENT:	What are the economic benefits and issues related to this?
RESPONSE:	This is not known or evaluated. NPS believes it is an impractical measure, designed as an attempt to please nonmotorized users. However, attention to this question is provided in the FSEIS.
COMMENT:	What will be the cost-per-visitor to the NPS during this time period?
RESPONSE:	This is not known.
COMMENT:	What are the impacts of an increase in visitor season to wildlife? How will this affect migration of bison to areas outside the park?
RESPONSE:	Attention to this question is provided in the FSEIS.
COMMENT:	Will having tracked vehicles on the road during the time park employees are driving their personal wheeled vehicles result in conflicts?
RESPONSE:	Attention to this question is provided in the FSEIS.

LETTER 93. ARTHUR UNGER, BAKERSFIELD CA	
COMMENT:	The FSEIS should refer to medical literature, which suggests that air filtering masks do not protect well against VOC or small particles. Specifically, the Harvard “Six Cities” study (<i>New England Journal of Medicine</i> , vol 329, p. 1753) and Small particles enter blood stream (the Jan. 29 th , 2002, issue of <i>Circulation: Journal of the American Heart Assc.</i>

RESPONSE:

NPS incorporated into the FSEIS the results of a 2001 study by Kado, et al., which examines environmental and occupational exposure to toxic air pollutants from snowmobiles. The efficacy of respirators is less of an issue than the fact that toxic air pollutants occur at unsafe levels for visitors and employees of national parks. NPS believes that the source of emissions should be removed rather than adopt measures that treat, albeit ineffectively, the symptoms.

LETTER 94. MICHAEL J. YOCHIM, MADISON WI

COMMENT:

You may want to include two additional publications in your bibliography, based on my master's thesis on snowmobile policy development in Yellowstone. I believe it would better to plow Yellowstone's west-side roads and open them to wheeled public transit vehicles. I have yet to find a place within 10 miles of a groomed road that is completely free of snowmobile noise. Yellowstone may be the only park that violates the Clean Air Act due to pollution generated within the park. National parks are contemplative in nature; snowmobiles are in conflict with this. National parks should be accessible to everyone – not just those capable of affording a snowmobile. If the NPS restricts winter traffic to four stroke snowmobiles, the park will be even more exclusive, since four stroke machines cost even more than two cycle machines. The park should not be controlled by local interests who only are interested in profiting from it.

RESPONSE:

Plowing the west side roads was proposed in the DEIS preferred alternative, B. The analysis of alternative B showed continuing adverse impacts of snowmobiles in the remainder of the park, absent any controls on snowmobile numbers.

LETTER 95. TIM YOUNG, JACKSON WY

COMMENT:

New groomed nonmotorized trails should be created in GTNP to meet the purpose and need, as GTNP maintains zero miles of groomed nonmotorized ski trails. Specifically, the corridor from the southwest park boundary near Teton Village to the Moose VC, and the corridor between Moose and Jenny Lake should be groomed for nonmotorized use. The road from Mailbox corner to the USFS trailhead for Shadow Mountain should be plowed to provide ski access. Any advisory committees should include a nonmotorized representative.

RESPONSE:

Continued access shall be provided to adjacent public lands for the purpose of maintaining existing recreation programs and uses on those lands. Nonmotorized recreation opportunities are not within the scope of analysis for the SEIS. Such suggestions may be consistent with the existing decision, however. The membership of any advisory committee will be approved or set by the Secretary of Interior.

LETTER 96. ROGER S. ZIMMERMAN, PH.D.**COMMENT:**

The smell of snowmobiles is obnoxious and is completely at odds with that many expect in a national park. I can hear snowmobiles along the Mallard Creek loop as far back as 4 miles. Inexperienced snowmobile riders create safety hazards. A 30-minute “quickie” lesson is worse than worthless; it leaves an absolutely inexperienced rider with the false impression that they can handle a powerful snowmachine. The focus for documenting effects on wildlife should be on proving there is no impact, rather than proving there is an impact, since the park is established to be a wildlife sanctuary. Heavy snowmobile traffic destroys road quality; funds spent on grading could be better used for other park purposes.

RESPONSE:

Snowmobile impacts on air quality, wildlife, natural soundscape and visitor experience are disclosed in the DSEIS and the earlier FEIS pursuant to the requirements of the National Environmental Policy Act. However, it is true that under existing regulations (e.g., 36 CFR 1.5 and 2.18) a park superintendent may at any time – on that authority – implement measures to protect wildlife or other park resources, or to address a health and safety issue.

Letters From Winter Use-Related Businesses (16 Letters)**LETTER 97. BILL BENNETT, ET AL.****BUSINESS OWNERS AND RESIDENTS OF WEST YELLOWSTONE MT****COMMENT:**

One hundred eighteen residents and business owners of West Yellowstone, Montana, signed and submitted a petition entitled “A Call for a Healthy Economy and a Healthy Park.” Petition points are as follows.

RESPONSE:

No response necessary.

COMMENT:

West Yellowstone has a history of adapting to management changes in the park. The economic well-being of the community depends upon the health and protection of the park. Changes in park winter use must occur in order to keep the park healthy. Reports of air and noise pollution hurt the reputation of the park and the community, and therefore, the economy.

RESPONSE:

No response necessary.

COMMENT:

Many predicted the demise of the economy because of the 1988 fires, as they predict the demise if snowmobiles are removed from the park. They were mistaken in '88 and are mistaken now. The community is resilient and it can take advantage of change.

<p align="center">LETTER 97. BILL BENNETT, ET AL. BUSINESS OWNERS AND RESIDENTS OF WEST YELLOWSTONE MT</p>
<p>RESPONSE:</p> <p>As provided in the FEIS and the existing decision, NPS is optimistic and confident in the ability of West Yellowstone and other communities (and their business adherents) to adapt to changes and take advantage of new opportunities. This has always been the case, despite predicted failures, as the commenter points out. The fundamental relationship between a national park and its gateway communities is defined in the context of opportunities and needs on both sides – and the inevitable attraction of a quality resource. The attraction will become greater as opportunities for the unique experience of enjoying protected natural landscapes declines. This ensures the continued viability of gateway communities as long as parks manage, or are allowed to manage, toward their conservatory and protective mandates. Unlimited growth is not a reality, but stability, diversity and quality of life are achievable.</p>
<p>COMMENT:</p> <p>The West Yellowstone area has over 300 miles of snowmobile trail, excellent cross-country trails, scenic beauty and the world’s first national park. The community will thrive as long as the natural beauty that attracts visitors remains unimpaired.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>Therefore, we ask NPS, state and congressional representatives to: Protect Yellowstone and ensure that visitors will continue to visit West Yellowstone. Support the community of West Yellowstone as it adjusts, diversifies, and rises to meet any challenges created by changes in park management.</p>
<p>RESPONSE:</p> <p>This is the nature of the existing decision. Any new decision should provide similar assurances.</p>
<p>COMMENT:</p> <p>A cover letter attending the petition and signatures states:</p> <p>The petitioners represent a broad cross-section of community residents and business owners who support the proposal to eliminate snowmobile access to the park, feeling strongly that this will help diversify the winter economy. A healthy park equals a healthy economy.</p> <p>By restricting access to snowcoach only, chronic air and noise pollution in the park will largely be eliminated. The community will be able to market itself to all winter tourists, not just snowmobilers, and create a much larger tourist base. Snowcoaches can carry for more visitors per day into the park than can ever be responsibly accommodated with snowmobiles. This is a win-win situation for West Yellowstone and wildlife in the park.</p> <p>Vocal snowmobile interests represent a small minority of the West Yellowstone community. Dire predictions of economic disaster are only a cover to protect the monopoly a small group of businesses has on the winter economy.</p>
<p>RESPONSE:</p> <p>See response to comment 4 above.</p>

**LETTER 97. BILL BENNETT, ET AL.
BUSINESS OWNERS AND RESIDENTS OF WEST YELLOWSTONE MT**

COMMENT:

YNP is not the only and not the best snowmobiling venue in the region. Most snowmobilers come for the superior snowmobiling outside the park. Most prospective winter visitors are simply tourists looking for the unique experience of visiting YNP in the winter. They will come regardless of the mode of access. It is simply not true that the survival of West Yellowstone depends on snowmobile access to the park – the economy is not so fragile as that.

RESPONSE:

Park Service policy (8.2 Visitor Use) also recognizes that not all uses need occur in national parks. It states that many forms of recreation do not require a national park setting and are more appropriate to other venues. Parks are to provide opportunities that are uniquely suited and appropriate to them, and defer to other agencies or entities to meet the broader spectrum of recreation demand. Allowable visitor activities are those that can be sustained without unacceptable impacts to park resources or values. It seems clear that since snowmobiling in its present form and quantity has unacceptable impacts, and that quality snowmobiling experiences are available in all areas surrounding the three park units, application of the policy is straightforward.

COMMENT:

The long-term economic viability of West Yellowstone is dependent upon the preservation of Yellowstone National Park.

RESPONSE:

See response to comment 4 above.

**LETTER 98. BIRCH, HORTON, BITTNER AND CHEROT,
REPRESENTING INTERNATIONAL SNOWMOBILE MANUFACTURERS ASSOCIATION**

COMMENT:

The decision to ban snowmobiles from the park road systems was unwarranted political action without factual or legal justification.

RESPONSE:

The decision to ban snowmobiles occurred after due consideration of an adequate range of alternatives whose effects (based on factual, scientific data) were disclosed in a carefully prepared environmental impact statement. An unprecedented level of public access was part of the process. The rationale for the decision was presented, considering environmental impacts, economic impacts, dictates of laws, executive orders, regulations and policies. The decision cannot be characterized as political, unwarranted, unjustified, or unsupported.

COMMENT:

Present snowmobile use causes no violations of national ambient air quality standards. The conversion to new, cleaner snowmobiles, which will occur rapidly as the proposed US EPA rules take effect, will reduce any existing impact of snowmobiles on the ambient air quality within the parks.

<p align="center">LETTER 98. BIRCH, HORTON, BITTNER AND CHEROT, REPRESENTING INTERNATIONAL SNOWMOBILE MANUFACTURERS ASSOCIATION</p>
<p>RESPONSE:</p> <p>Violations of NAAQS are in the realm of possibility if alternative 2 or 3 are implemented, even assuming that the use of cleaner and quieter snowmobiles is ensured. The role of EPA rules in this is problematic, since there is doubt that the fleet average would actually be clean and quiet, since proponents are working to limit the impact of the rule on its production, and since the rule will take two phases and many years to implement. The key point that is often missed is that clean air is a critical value of national parks and that it is expected by most visitors to be so. The notion that NAAQS standards may not be violated (or may only occasionally be violated) leaves the possibility that air quality may still be extremely bad against the Class I standard that says air quality should be the best that it can be. The fact that there is a significant health risk to park employees and visitors, even though no standard may have been exceeded, speaks strongly to this issue.</p>
<p>COMMENT:</p> <p>Use of snowmobiles is restricted to 185 miles of the park’s 275-mile road system, and snowmobile sound impacts occur only along this portion of the roadway system. Snowmobile impacts on the “natural soundscape” are less than the impacts generated by the over 1.5 million autos, buses, RVs, SUVs, trucks and motorcycles that travel the road system in the spring, summer and fall. Conversion to new technology snowmobiles will also provide more quiet conditions.</p>
<p>RESPONSE:</p> <p>The DSEIS demonstrates that the sound of snowmobiles occurs well outside and beyond the roadway system. The area that is accessible to most winter visitors, including those who expect solitude and natural-sounding landscape, is impacted by snowmobile noise. There is no evidence presented that supports the claims made in this comment comparing summer and winter use. NPS received input through this process that indicates 4-stroke machines are not quiet, though they may be quieter.</p>
<p>COMMENT:</p> <p>There are no adverse impacts on wildlife populations, which are thriving in the parks.</p>
<p>RESPONSE:</p> <p>There need not be population-level impacts in order to find either impairment or adverse impacts on wildlife. Wildlife (ungulates in particular) are indisputably harassed, stressed, displaced, killed, and removed from winter habitats of choice. It has not been demonstrated that the cumulative effect of these impacts, and any resultant habitation, has culminated in a population effect. On the contrary, it has also not been demonstrated that there is no impact on the population as the commenter claims. Population level impacts do not equate strictly to numbers. Credible scientists have advanced theories and evidence of population level effects in bison, but there is no consensus yet on the issue of the extent or importance of these effects.</p>
<p>COMMENT:</p> <p>The political decision to ban snowmobiles creates a terrible precedent that threatens traditional summer visitors. If 65,000 snowmobiles produce unacceptable impairment on the park, then more than 1.5 million autos, etc. are certainly worse. If mere “disturbance” of individual animals along the roads necessitates a ban of snowmobiles, summertime disturbance caused by the daily bison, elk, or moose “jams” cannot be permitted to continue.</p>

**LETTER 98. BIRCH, HORTON, BITTNER AND CHEROT,
REPRESENTING INTERNATIONAL SNOWMOBILE MANUFACTURERS ASSOCIATION**

RESPONSE:

See response to comments 1 and 4, above. This comment obfuscates the point that there is a disproportionate effect on wildlife caused by snowmobiles, which are fewer in number. This has to do with the winter season and the availability of seasonal habitat that is critical to the survival of animals. A decision maker rightly considers the severity and nature of the “disturbance” in deciding what to do about it. It is the function of the EIS to disclose the magnitude, intensity and duration of the impact for that reason. Winter impacts are appropriately addressed on their own merits regardless of what may happen in the summer.

COMMENT:

ISMA strongly recommends rejection of the snowmobile ban and adoption of a new winter use plan that provides for rapid conversion of nearly three quarters of the snowmobiles entering these parks to new cleaner, quieter models as well as continued restriction of use to the road system.

RESPONSE:

The decision to be made must provide rationale as to what constitutes strict limitations on snowmobiles, thereby mitigating impairment and adverse effects on park resources and values as found in the existing decision.

COMMENT:

These features are reflected in Alternative 2, the Wyoming Alternative, in the DSEIS. ISMA supports this alternative with two modifications: 1) limit mandatory conversion to rental fleet sleds only, and 2) describing the cleaner, quieter sleds in a manner reflecting pending action by the EPA.

RESPONSE:

NPS will make changes in alternative pursuant to Wyoming’s request to do so. See letter from the State of Wyoming.

COMMENT:

The Clean Air Act limits the ability of NPS to regulate exhaust emissions. NPS should keep these limitations in mind as it completes this SEIS process and proceeds with a new record of decision. ISMA recognizes that NPS does have the authority to regulate the provision of commercial services within units of the NP system. ISMA suggests the NPS exercise this authority with regard to the entities that rent snowmobiles for use within YNP and GTNP.

RESPONSE:

There has never been any doubt in NPS’ mind about its regulatory authority, or lack of it in this instance. That is why, in part, NPS requires all machines enter the park under the auspices of an NPS-permitted guide.

COMMENT:

The “guide” requirement in alternative 3 is an affront that is wholly unnecessary and an affront to thousands of responsible law abiding winter visitors to these parks. There is no basis in fact or law to impose second-class status on winter visitors.

<p align="center">LETTER 98. BIRCH, HORTON, BITTNER AND CHEROT, REPRESENTING INTERNATIONAL SNOWMOBILE MANUFACTURERS ASSOCIATION</p>
<p>RESPONSE:</p> <p>It appears that many proponents of allowing snowmobiles agree that limitations are necessary and that cleaner and quieter machines should be used in the parks. However, as in this comment, they are opposed to measures that are necessary to ensure these things can be implemented. There are very good reasons why guided tours-only are necessary. Among them are: mitigation of wildlife impacts, assurance as to use of cleaner and quieter machines, better adherence to “strict regulations and speed limits,” safer travel for novices, enhancement of visitor experience (guide-provided interpretation and knowledge), and reduced need for enforcement personnel.</p>
<p>COMMENT:</p> <p>ISMA provides an appendix of 13 pages containing specific page-by-page comments. Appendix II is a 4 page document assessing NPS authority (or lack thereof) to regulate snowmobile emissions.</p>
<p>RESPONSE:</p> <p>The specific comments have been reviewed and considered. Comments that apply to information in the final document will be further considered.</p>
<p>COMMENT:</p> <p>Snowmobiling is a relatively low cost form of recreation and cost is not a barrier to participation particularly given the fact that 70% of snowmobile entries in YNP are on rental sleds.</p>
<p>RESPONSE:</p> <p>See response to comment letter 60 regarding affordability</p>

<p align="center">LETTER 99. BIRCH, HORTON, BITTNER AND CHEROT REPRESENTING INTERNATIONAL LEISURE HOSTS, LTD.</p>
<p>COMMENT:</p> <p>Banning snowmobiles is an ill-conceived, excessive, unjustified, politicized decision that ignores the fact that snowmobiles as they are currently used in the parks do not endanger park wildlife or the environment. Further, as older existing snowmobiles are replaced gradually by models with new technology, their minimal impact on ambient air quality within the parks will be further reduced.</p>
<p>RESPONSE:</p> <p>The decision to ban snowmobiles occurred after due consideration of an adequate range of alternatives whose effects (based on factual, scientific data) were disclosed in a carefully prepared environmental impact statement. An unprecedented level of public access was part of the process. The rationale for the decision was presented, considering environmental impacts, economic impacts, dictates of laws, executive orders, regulations and policies. The decision cannot be characterized as political, unjustified, or unsupported.</p>

**LETTER 99. BIRCH, HORTON, BITTNER AND CHEROT
REPRESENTING INTERNATIONAL LEISURE HOSTS, LTD.**

COMMENT:

There is no legal or factual justification for restrictions because present snowmobile use does not threaten the clean air standards, does not threaten wildlife, and does not impact the “natural soundscape” beyond the road systems.

RESPONSE:

NPS disagrees; such impacts are disclosed and fully supported in the FEIS and DSEIS.

COMMENT:

Any ban or severe restriction on snowmobile access by the NPS would constitute a breach of its contract with Flagg Ranch, which requires Flagg Ranch to provide snowmobile rentals and tours, and the NPS to provide access to the Parks. Also, any cessation in plowing the roadways that would be used by guests of Flagg Ranch would constitute a breach, as they would render performance impossible.

RESPONSE:

All contracts/concession agreements contain language that applies in the event that resources are being adversely impacted or impaired by the permitted use. A contractual obligation does not outweigh the fundamental mandate of the national park service. As to road plowing, NPS has stated time and again that the road would continue to be plowed through the duration of the current contract, unless both parties agreed otherwise. This is not inconsistent with the decision to go to snowcoach only, since the practice of road plowing on this road segment is not fundamental to the overall finding of impairment.

COMMENT:

While we do not believe any action is necessary, we strongly support alternative 2, which is a reasonable compromise, providing rational, common-sense limits on the use of snowmobiles while preserving at least some of the rights of park visitors.

RESPONSE:

No response necessary.

COMMENT:

We oppose alternatives 1a and 1b as the political approach championed by the previous administration, which used a lawsuit by animal rights extremists as a pretext to ban snowmobiles from the parks. Mass transit snowcoaches are unacceptable to the many park visitors who wish to participate without being crammed into the functional equivalent of winterized city buses.

RESPONSE:

See response to comment 1. It is clear that many people also oppose the use of snowmobiles in the national parks. Many people are no longer free to enjoy these parks unimpaired by the constant impact of snowmobiles on air quality, natural sounds, or enjoyment of undisturbed wildlife in its natural setting.

LETTER 99. BIRCH, HORTON, BITTNER AND CHEROT REPRESENTING INTERNATIONAL LEISURE HOSTS, LTD.	
COMMENT:	Alternative 3 would place severe and completely unwarranted restrictions on snowmobile use in the parks. Snowmobiles would be banned under this alternative, except for a very limited number and NPS guides would be required.
RESPONSE:	Alternative 3 provides, overall, a greater amount of snowmobile use than occurs in the average year. This clearly does not constitute a ban on their use. It would seem that the restrictions would be acceptable to those who agree some limitations are necessary, as an alternative to having no snowmobile access at all.
ATTACHED LETTER FROM INTERNATIONAL LEISURE HOSTS, LTD.	
COMMENT:	Flagg Ranch strongly supports Alternative 2 developed by the Cooperating Agencies. We have made significant investments as part of the concession contract with NPS of approximately 9 million dollars.
RESPONSE:	No response necessary.
COMMENT:	The investment and commitment was based on summer and winter operations. Some of the proposed changes in the SEIS would make it infeasible for Flagg Ranch to operate in the winter, while the contract stipulates that capital investments will not be required if it prevents the concessioner from making a reasonable rate of return. Alternatives 1a and 1b limit our ability to operate and are a breach of our contract.
RESPONSE:	See response above to comment 3.
COMMENT:	Presently available snowcoach vans have not proven reliable and comfortable. For our operation at a minimum we would have to purchase 15 vehicles. Our total investment would be about \$1.05 million to as much as \$2.25 million for a snowcoach with acceptable safety and comfort features. We do not believe the market will support this use or this investment on our part.
RESPONSE:	NPS cannot speculate on what may be strictly a business decision, or on priorities regarding services you wish to provide.
COMMENT:	Guided tour requirements would shrink our revenue base and the benefit of the winter season will be substantially reduced.
RESPONSE:	No response necessary.

**LETTER 99. BIRCH, HORTON, BITTNER AND CHEROT
REPRESENTING INTERNATIONAL LEISURE HOSTS, LTD.**

COMMENT:

The SEIS statement that actions that substantially effect [sic] an existing contract will be renegotiated or implemented when a new contract is awarded results in a contradiction. Absent any renegotiation, the elimination of snowmobiles should not take place until after our contract expires in December 2009. This is in direct conflict with Alternatives 1a and 1b.

RESPONSE:

See response to comment 3, above.

LETTER 100. GRAND TETON LODGE COMPANY

COMMENT:

The Grand Teton Lodge Company suggests a combination of Alternatives 2 and 3. Alternative 2 is supported for emission and sound standards, wildlife, winter season, interpretation, orientation and access with the addition of the road north of Colter Bay Village becoming an oversnow route after 2009. Alternative 3 is supported for interim limits and the phase in period.

RESPONSE:

No response necessary.

LETTER 101. GLEN LOOMIS, WEST YELLOWSTONE MT

COMMENT:

Although the SEIS alternatives are intended to maintain the current level of visitation, they do not accomplish this goal. Please consider the value of commercial building permits issues since 1995 (table included in comment letter). This information clearly shows the impact that has already fallen on our community resulting from the outcome of the NPS decision.

RESPONSE:

The amount of allowable growth, in terms of the number of snowmobile visitors, is not infinite. Current levels of use are associated with adverse impacts on park resources that would be mitigated by replacing snowmobile visits with snowcoach visits. The conclusion is that the community needs to revisit its goals in light of limited growth potential for this one type of use. It is doubtful that the value of commercial building permits is solely attributable to the winter use decision, and no evidence is offered to support that view.

COMMENT:

The Jackson Hole Scientific Investigations report clearly demonstrates that the contribution of CO per passenger would be less for those riding 4-stroke snowmobiles than for those riding snowcoaches. A total of 60,000 visitor days are needed in West Yellowstone for the town to remain a viable partner to YNP.

LETTER 101. GLEN LOOMIS, WEST YELLOWSTONE MT
<p>RESPONSE:</p> <p>See response to Bennett, the initial letter in this section. The park is concerned about its viability in light of mandates, regulations and policies that require resource conservation and protection.</p>
<p>COMMENT:</p> <p>The only real long-term change to increased snowcoach ridership will result from the development and implementation of the new red bus. There has to some clear signals about how a phase-in period could be managed to get more ridership on snowcoaches.</p>
<p>RESPONSE:</p> <p>The willingness of the business community, along with that of the park service, can accomplish much. The continued emphasis and reliance on snowmobiles – while disparaging the potential for snowcoaches as a mode of access - sends a message. It represents a strong disincentive to those who might otherwise assist in funding development and implementation of a “viable” snowcoach solution. If all partners were committed to a desired outcome and working toward it, phasing would essentially take care of itself through necessary and mutually agreeable adjustments.</p>
<p>COMMENT:</p> <p>The analysis that about 300 snowmobiles caused deterioration of the snow surface on some days is flawed, because it doesn’t recognize that grooming could be improved in almost all cases.</p>
<p>RESPONSE:</p> <p>No amount of grooming will improve a snow surface that is at or near melting temperature, especially when West Yellowstone-magnitude traffic is being experienced.</p>
<p>COMMENT:</p> <p>Any alternative needs to protect the historic use, but the test should not be “seats available” but seats that are being used.</p>
<p>RESPONSE:</p> <p>Seats will not fill themselves initially. See response to 3, above. A willingness to make the program work, an open attitude toward the need for the program, and suitably cooperative marketing efforts are necessary. This kind of environment began shortly after the decision was made in 2000. However hopes of a decision reversal, and diversion of agency resources to help accomplish it, have scuttled the positive effort. NPS believes that there is a large nationwide (and local) market consisting of people who desire a different winter experience than can presently be had in these parks. Many people state that they used to come, but no longer do. Many local people fit this category. Many people say they have never come as they have been deterred by the presence of snowmobiles.</p>
<p>COMMENT:</p> <p>I request you provide documentation for the statement that a majority of local residents agree that snowmobiles adversely impact the park and should be limited. Minority and low income populations should not have been dismissed, because the loss of jobs discussed in the socioeconomics section will fall first on the minority and low income populations.</p>

LETTER 101. GLEN LOOMIS, WEST YELLOWSTONE MT

RESPONSE:

It should be noted that all statements made in the summary table are distilled from the analysis presented in detail in Chapter IV. NPS has been careful to note in past documents that summary presentations do not represent the actual disclosure of impacts, and thus do not replace the more detailed analysis. Regarding the statement in question: all the survey data reported in the DSEIS indicates that a majority of local residents agree with the need to use cleaner and quieter machines, to limit use, to restrict use, or to ban use. Stated another way, a minority of local residents feels that there is no need for any such limitations on snowmobile use. NPS infers that when people agree there is a need for some restriction, it is because there is some adverse impact that must be addressed. The potential for job losses, which is disclosed in the effects analysis, is not tantamount to an impact on socially or economically disadvantaged populations. NPS affirms the dismissal of this topic.

COMMENT:

The gas masks used at the West Entrance do not provide protection from formaldehyde.

RESPONSE:

NPS does not need a better gas mask. It needs a significant reduction in pollution.

COMMENT:

Snowmobile-bison impacts are fictional – there were far fewer bison when snowmobile access started and now there are almost 4,000. Look at the total picture of animal impacts and manage the bison population.

RESPONSE:

No response necessary.

COMMENT:

Human generated sounds in developed areas are not unreasonable, and goals of having only natural soundscapes in these areas need to be revisited.

RESPONSE:

NPS points out that the major impact of concern is that noise goes well beyond the development areas into other areas where solitude and quiet are expected. However, even development areas are in the national parks and it is unreasonable that excessive noise should be present nearly 100% of the time in those areas. As with air quality objectives, the natural soundscape should be as quiet as it can be. Different levels of noise tolerance are described in the different park management zones – more noise is to be tolerated in development zones.

LETTER 101. GLEN LOOMIS, WEST YELLOWSTONE MT
<p>COMMENT:</p> <p>It is not possible to maintain historic visitor numbers by substituting skiers for snowmobilers. The displacement of snowmobilers to national forests is real and should not be dismissed. Establishing a carrying capacity should be done after efforts to mitigate the impacts have been exhausted. The preamble to the plan should clearly show that you intend to try to support historical visitation at every gate. Reservations for the Christmas holiday and President's Day weekend should be sufficient – not the entire season. A limit of 150 snowmobiles on the CDST is arbitrary – the traffic should be studied in more detail. The rubber track snowcoach being allowed from mid-November to the second Tuesday in December should be implemented immediately. Explore incentives to get more double riding snowmobiles and more snowcoach ridership. Establish an advisory council with local gateway business people on the council as well.</p>
<p>RESPONSE:</p> <p>These points remain for the decision to be made and the implementation of the decision. Many measures have been identified as parts of alternatives in the FEIS, or as possible implementation activities.</p>
<p>COMMENT:</p> <p>Mr. Loomis also enclosed a copy of the letter from Howard E. Haines, Montana Department of Environmental Quality, to Bill Howell of West Yellowstone.</p>
<p>RESPONSE:</p> <p>The letter from Mr. Haines states that no violations of NAAQS or MAAQS have yet been monitored at the West Entrance of YNP. However, the letter goes on to acknowledge that data shows high readings of CO that might indicate a public health concern, and that residents and area workers have complained about visible pollution at the entrance. He states that there are other pollution concerns for workers in the area.</p>

LETTER 102. MATTRACKS WORLDWIDE TRACK TECHNOLOGY
<p>COMMENT:</p> <p>We support alternative 1.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>

LETTER 102. MATTRACKS WORLDWIDE TRACK TECHNOLOGY

COMMENT:

- ❖ Passenger capacity of the snowcoaches should be 6 to 15, inclusive of driver. Lower capacity will not meet your objective of fewer motorized units in the national parks. Larger units would tend to congest roadways because of their size or would damage park resources because of their weight.
- ❖ For human safety, only rubber track systems that have been tested and “safety approved” by a government approved testing facility should be used.
- ❖ The snowcoaches must meet EPA emission standards for use on highways and public roads. No older vehicles should be acceptable.
- ❖ As for noise, front steer, rubber “four tracked” vehicles, moving 6 to 15 passengers at a time, meet the noise level standards and would allow NPS to achieve their objective of reduction of units in the park and reduction of units that produce excessive noise.
- ❖ Rubber tracks are better than a cleated or metal track because: quieter; light, non-aggressive footprint; can travel on a variety of surfaces (sand, snow, gravel, blacktop) with minimal damage to the terrain or road surface. This would allow a longer winter season.
- ❖ Four tracks are better than two tracks and articulating four tracks because they can damage the terrain or road surface when turning.
- ❖ Snowcoaches should be a single inclusive enclosure for driver and passengers. The driver can better monitor the safety of the passengers, this interaction will increase the passenger’s satisfaction, you avoid congestion that occurs with hinged, trailered, and other large vehicles.

RESPONSE:

More information is provided in the FSEIS in regard to snowcoach technology and development of a new generation conveyance. This information is helpful in that regard.

COMMENT:

Attachments include a May 28, 2002, letter from Mattracks Worldwide Track Technology to the NPS with comments on draft guidelines proposed for new snowcoaches.

RESPONSE:

No response necessary.

LETTER 103. DAVID MCCRAY, WEST YELLOWSTONE MT

COMMENT:

I support alternative 2. I rent 145 snowmobiles in West Yellowstone, Montana, and am interested in adding snowcoaches as an addition to, but not a substitution for, the services we offer our clients.

RESPONSE:

No response necessary.

LETTER 103. DAVID MCCRAY, WEST YELLOWSTONE MT
<p>COMMENT:</p> <p>Snowcoaches are extremely unreliable. Frequent repairs are costly and diminishes clients Yellowstone experience.</p>
<p>RESPONSE:</p> <p>Snowcoach transport has been an intrinsic part of winter access to Yellowstone for some time. The emphasis, marketing and otherwise, on snowmobile access has not provided any incentive to improve snowcoaches. Accepting that some individual snowcoaches are unreliable, NPS believes that this does not have to be the case. Improved snowcoach technology is fundamental to the future winter program in the parks.</p>
<p>COMMENT:</p> <p>Snowcoaches have 6 times the emissions as the new 4-stroke snowmobiles. The emissions are less per user if the snowcoach has the average 6 passengers and 6 visitors “double-up” on three 4-stroke snowmobiles.</p>
<p>RESPONSE:</p> <p>This allegation has not sufficiently been demonstrated. The desired future for snowcoaches is to maximize the number of passengers that can comfortably be accommodated, with the minimum desired capacity of 8. It is appropriate to point out that the more “doubling-up” that occurs with any allowable snowmobile travel – holding visitation constant – the greater the reduction in total emissions.</p>
<p>COMMENT:</p> <p>4-stroke snowmobiles are significantly quieter than snowcoaches at 20 mph.</p>
<p>RESPONSE:</p> <p>NPS points out that this is not a competition between snowcoaches and snowmobiles. Emphasis for future access is and will continue to be via snowcoach. As stated earlier, NPS is committed to improving snowcoach performance, convenience, and emission and sound outputs. The analytical purpose of the SEIS is to evaluate new <u>snowmobile</u> technology and how it can mitigate impacts that were identified in the FEIS.</p>
<p>COMMENT:</p> <p>Snowcoaches are very expensive. To replace my current capacity (230 people per day), I would need to spend \$2.3 million, instead of the \$700,000 for 145 sleds.</p>
<p>RESPONSE:</p> <p>Though the initial cost of a snowcoach is clearly much higher than that of a snowmobile, one should also consider a machine’s serviceable life, the cost of maintenance during that life, and its trade-in or surplus value. New “cleaner and quieter” snowmobiles are more expensive initially, and they have a much shorter life span than a snowcoach. The relative maintenance costs and salvage values of new snowmobiles are unknown. The arguments against requiring new snowmobile technology several years ago were exactly these: high initial cost, high maintenance, uncertain trade-in (who would want one of these underpowered machines, used?), and uncertainty about whether they would be produced by industry to start with.</p>

LETTER 103. DAVID MCCRAY, WEST YELLOWSTONE MT	
COMMENT:	My current garage space is sufficient for my snowmobile fleet, but would not be sufficient for snowcoaches. The cost of a new building would be \$500,000 if I could build at my current location.
RESPONSE:	No response necessary.
COMMENT:	Most of my 10,000 customers a year say they would not consider traveling in a snowcoach in Yellowstone.
RESPONSE:	NPS is certain that there is a market for snowcoach travel, wherein a new winter experience would be available within the parks. At the same time, opportunities for quality snowmobiling outside the parks remain available. Most current customers spend the majority of their snowmobile days outside the park.
COMMENT:	Snowcoaches must be completely redesigned.
RESPONSE:	See response to comment 2 above. NPS is facilitating efforts to research and design a new generation snowcoach. More discussion of this will be presented in the FSEIS.
COMMENT:	At this point in time, snowmobiles are much further along in the design of cleaner engines that are snowcoaches. Until such time as a more reliable, cleaner burning, quieter snowcoach can be developed and is available, snowmobile use should continue in Yellowstone.
RESPONSE:	The FEIS and DSEIS clearly demonstrate that access by snowcoach only – even with the current mix of snowcoaches – produces far fewer total emissions and is far less audible throughout the three park units than with any mix of new or old snowmobiles.

LETTER 104. OLD FAITHFUL SNOWMOBILE TOURS	
COMMENT:	I have witnessed the joy American citizens experience during a winter snowmobile tour of Yellowstone and do not believe this experience should be taken away. I am firmly opposed to a complete ban on snowmobile use in Yellowstone. New technology, guided tours, and limitations on visitor numbers are requirements that should be implemented so snowmobiling can continue and the resource can be protected.
RESPONSE:	No response necessary.

LETTER 104. OLD FAITHFUL SNOWMOBILE TOURS
<p>COMMENT:</p> <p>During the winter of 2001-02, I purchased four of the new generation of 4-stroke snowmobiles. I experienced the usual problems with a new product, but learned that the new snowmobiles are much cleaner and quieter than previous sleds. This technology will continue to improve, enabling visitors to have access to Yellowstone in a non-polluting, environmentally friendly manner. As a participant in the Clean Snowmobile Challenge, I have seen first hand the improvement every year in noise and emissions of the participating snowmobiles. As technology continues to improve, the environmental impact of snowmobiles will continue to lessen.</p>
<p>RESPONSE:</p> <p>NPS is encouraged by the production of cleaner and quieter snowmobiles. As the commenter appears to be aware, technological improvement will not reduce environmental impacts overall unless NPS has a means for ensuring its use in the parks and for limiting the numbers of machines entering the parks. Other mitigation measures are clearly necessary to ensure that adverse impacts on wildlife are eliminated.</p>
<p>COMMENT:</p> <p>My employees (snowmobile guides) learn how to conduct a tour with the least amount of impact to wildlife and the environment. I am not a proponent of guided tours only because that is my business, but because I believe that trained, professional guides provide the best interpretive experience for a visitor and wildlife harassment issues are lessened through the use of a guide.</p>
<p>RESPONSE:</p> <p>NPS asserts that given the current adverse impact and impairment, strict measures need to be introduced if snowmobiles are to remain at some level in the parks. This is essentially what the current rule says. A critical part of implementation, to assure a quality experience for visitors and to reduce impacts, is the inclusion of knowledgeable guides as part of the solution. This is far more preferable than trying to achieve the same end strictly by the use of law enforcement personnel.</p>
<p>COMMENT:</p> <p>Anyone who has been at Old Faithful on a busy winter day would agree that a limitation on numbers is necessary. Limiting numbers would improve the visitor experience and visitor impacts would be lessened.</p>
<p>RESPONSE:</p> <p>NPS agrees.</p>
<p>COMMENT:</p> <p>A snowcoach only plan is unrealistic and not an environmentally conscious alternative to park access. A reliable, comfortable, safe snowcoach does not exist. Snowcoach noise and emissions have not been adequately addressed. The new generation of 4-stroke snowmobiles are much cleaner and quieter than existing snowcoaches. Snowcoaches consume a large amount of gas and gas storage in Yellowstone is inadequate for the number of snowcoaches proposed by the snowcoach only alternative.</p>

LETTER 104. OLD FAITHFUL SNOWMOBILE TOURS

RESPONSE:

A snowcoach-only plan is workable, if it is the only alternative to eliminate the impairment and adverse impacts associated with snowmobiles. A new generation snowcoach is necessary to meet this need.

LETTER 105. PAHASKA TEPEE RESORT

COMMENT:

We strongly agree with alternative 2.

RESPONSE:

No response necessary.

COMMENT:

All rental and public snowmobiles should be limited to 4-stroke, or equivalent noise and emissions standard 2-strokes.

RESPONSE:

This is the intent of alternatives 2 and 3 in the DSEIS.

COMMENT:

Public snowmobiles should fall under the same decibel range as commercial and snowcoaches.

RESPONSE:

NPS points out that this is not a competition between snowcoaches and snowmobiles. Emphasis for future access is and will continue to be via snowcoach. As stated earlier, NPS is committed to improving snowcoach performance, convenience, and emission and sound outputs. The analytical purpose of the SEIS is to evaluate new snowmobile technology and how it can mitigate impacts that were identified in the FEIS. The FEIS and DSEIS clearly demonstrate that access by snowcoach only – even with the current mix of snowcoaches – produces far fewer total emissions and is far less audible throughout the three park units than with any mix of new or old snowmobiles.

COMMENT:

Interim limits in alternative 2 are preferable, but additional use at the east and north entrances could be considered. The current use at both entrances is barely capable of sustaining a healthy economic climate. A dedicated groomer from east to Lake, stationed closer to the pass at the east entrance station, could be the best choice to alleviate the unreliability of the east entrance road.

RESPONSE:

Both SEIS snowmobile alternatives allow significant growth in use at the East Entrance, subject to future monitoring and adaptive management. NPS points out that the current use has not been subject to any caps, and there may be other reasons why use is not very high at that entrance.

LETTER 105. PAHASKA TEPEE RESORT
<p>COMMENT:</p> <p>Any significant limitations of recreational use at the east entrance would shut down our winter operation at Pahaska Tepee and would be a major setback to winter recreational use in the Shoshone National Forest.</p>
<p>RESPONSE:</p> <p>See response to comment 4, above. Regarding recreation use on the Shoshone National Forest, the only legal snowmobiling that can occur from Pahaska is westward into the Park. Snow is marginal along the highway for most of the winter east of Pahaska – and there are no snowmobile trails on the Forest there. Wilderness is less than a mile both north and south of Pahaska. On the other hand, the emphasis on snowmobiling out of Pahaska has undoubtedly discouraged cross-country skiers and snowshoers who used to frequent the area both on the forest and into the park in past years. Snowmobilers with trucks and trailers have dominated limited parking at Pahaska, and use of the road surface. Pahaska management has created its own dependency on snowmobiling, but this is not irreversible. Therefore, a de-emphasis on snowmobiling at Pahaska, which is not a feature of either alternative 2 or 3, would likely increase winter recreation use on the Shoshone National Forest – because the only winter use possible on the forest in that area is nonmotorized (Ref. Shoshone Forest Plan and the GYCC Multi-agency Winter Use Assessment).</p>
<p>COMMENT:</p> <p>Regularly scheduled snowcoach trips by the park’s primary concessionaire, with service to the east entrance and Cody is necessary if this entrance is ever going to prosper.</p>
<p>RESPONSE:</p> <p>The existing decision contains a measure whereby the potential for safe snowcoach travel to the East Entrance will be evaluated and implemented if possible. It carries a caveat about avalanches and the possibility of random route closures due to avalanche danger.</p>
<p>COMMENT:</p> <p>Need more groomed, nonmotorized trails, including ones near lake butte and in the bottom of Middle Fork near the east entrance.</p>
<p>RESPONSE:</p> <p>See response to comment 5.</p>
<p>COMMENT:</p> <p>Air quality studies should be done by Wyoming and Montana. The proposed restrictions seem not only unrealistic but designed with intent to undermine the current recreational opportunities of Yellowstone.</p>

LETTER 105. PAHASKA TEPEE RESORT

RESPONSE:

NPS and Montana have been working cooperatively on air quality monitoring at the West Entrance. Wyoming established a limited monitoring station at Flagg Ranch without fully cooperating with the winter use study team in terms of objectives, methods or data sharing arrangements. Wyoming DEQ has been highly critical of the air quality analysis, while expressing the idea that there is no concern regarding air quality. Wyoming has been insistent upon its primacy in managing air quality in the park and objects to the preparation of PSD or visibility analyses by NPS. NPS would like to develop and maintain a good, cooperative relationship with both states in which objectives, roles, and authorities are jointly agreed upon as a basis for further study.

COMMENT:

Visibility concerns at staging and distribution areas should be discarded because there is no analysis of the conditions or proposed restrictions. Emissions would be a problem with snowcoaches only.

RESPONSE:

This comment is unclear. Visibility analysis will be included in the FSEIS. "Proposed restrictions" are set out in the two SEIS alternatives allowing snowmobiles. Total emissions are shown to be greater in both alternatives that allow snowmobiles (cleaner and quieter) than in the snowcoach only alternative that does not reflect the potential for cleaner and quieter snowcoaches. Other commenters have pointed out that there is an unfair comparison in the SEIS analysis, i.e., comparing the cleanest and quietest snowmobiles with the "dirtiest and noisiest" snowcoaches. This is true to a degree. Even so, snowcoach access only, even with dirty snowcoaches, outperforms either snowmobile alternative with "cleaner" machines in terms of total emissions.

COMMENT:

Consider economic effects in gateway communities and surrounding states. The SEIS is flawed by not addressing economic feasibility studies and potential business plans for operators in the region's economy.

RESPONSE:

The SEIS, like the FEIS, considered all relevant economic data at the county level, aggregated to the five-county region, and beyond to the 3-state area. NPS responded to commenters between the DEIS and FEIS to look at the five-county area instead of the 17-county area evaluated in the DEIS. Earlier comments in the SEIS process have changed focus to the community level, for which there are no effective economic impact models or consistent data inputs available between communities. NPS has responded by stating that there will be more discussion of economic impacts for gateway communities using some other form of analysis.

COMMENT:

Under a snowcoach only alternative, we would experience a 50-60% drop of Yellowstone winter use, resulting in at least a 40% drop of operating revenues during the winter season.

RESPONSE:

NPS will reflect this statement in the FSEIS.

LETTER 105. PAHASKA TEPEE RESORT	
COMMENT:	The government should mitigate detrimental economic effects by compensating communities and commercial operators. The increased expense of a snowcoach only alternative will put most current operators out of business.
RESPONSE:	NPS recognizes there will be start-up costs. NPS intent is to facilitate the start-up, and prior to the SEIS process was engaged in locating sources of funding for this purpose.
COMMENT:	Wildlife harassment is a law enforcement problem, not a snowmobile problem. Same with visitor conflicts and unsafe behavior.
RESPONSE:	Commenter's opinion. NPS defers to the analysis of impacts in the FEIS and DSEIS.
COMMENT:	The health and safety issues in alternative 2 are addressed by the new 4-stroke technology.
RESPONSE:	Impacts on health are not only a function of the pollution generated by a single machine, but also by the number of machines at any given time and place.
COMMENT:	Access issues include not only roadways, but stopping points not forced by a guide.
RESPONSE:	No response necessary.
COMMENT:	Most current visitors would stop coming to Yellowstone under a snowcoach only alternative.
RESPONSE:	It can be concluded, then, that their reason for visiting the parks was mostly to ride a snowmobile. Snowcoaches, improved over the near future, will provide a motorized means of visiting the parks to enjoy the unique values and resources within them.
COMMENT:	Driving time for snowcoaches prevents a Pahaska visitor to travel the lower loop, requires an overnight at Canyon or Old Faithful.
RESPONSE:	No response necessary.
COMMENT:	Visitor experiences of quiet and solitude would significantly improve in alternative 2 with the 4-stroke technology. Clean air would improve under alternative 2.

LETTER 105. PAHASKA TEPEE RESORT
<p>RESPONSE:</p> <p>In neither case would the improvement be as great as in alternatives 1a or 1b. Given that the current decision, promulgated in a rule, is alternative 1a, alternative 2 would significantly and negatively impact air quality, quiet, and solitude in comparison. For most sound parameters, alternative 2 significantly increases the impact as compared to the existing condition – FEIS alternative A. The area in which vehicles are audible more than 50% of the time is doubled in alternative 2, and nearly quadrupled as compared to SEIS alternatives 1a and 1b.</p>
<p>COMMENT:</p> <p>Opportunities to view scenery and wildlife would be lessened under alternative 1.</p>
<p>RESPONSE:</p> <p>This statement is not supported in the analysis.</p>
<p>COMMENT:</p> <p>The adaptive management plans should emphasize the 1872 act creating Yellowstone as a public park or pleasuring ground for the benefit and enjoyment of the people.</p>
<p>RESPONSE:</p> <p>The commenter is unaware of fundamental direction for management of national parks. The Organic Act, as amended, regulations, policies, executive orders, all underline the primary mission of the park service to conserve and protect resources so that they may be enjoyed. A form of use that has adverse impacts or impairs park resources and values must be eliminated or altered so those impacts do not occur.</p>
<p>COMMENT:</p> <p>Significant safety concerns arise in a snowcoach only environment. Snowcoach only will create a congestion problem at Old Faithful. To alleviate this, more emphasis should be placed on the Canyon area (more hot meals, visitor services, overnight accommodations).</p>
<p>RESPONSE:</p> <p>See response to comment 3 above. It is difficult to see how congestion at Old Faithful could be any worse than at present with uncontrolled and unlimited snowmobile access.</p>
<p>COMMENT:</p> <p>The snowmobile industry should be given more time to meet the clean air standards for Yellowstone. Yellowstone also needs to provide snowmobile driver certification and educational opportunities.</p>
<p>RESPONSE:</p> <p>See numerous previous comments/responses about air quality and best available technology.</p>
<p>COMMENT:</p> <p>If public use of snowmobiles is banned in Yellowstone, it would be unethical for NPS to use snowmobiles for administrative uses.</p>

LETTER 105. PAHASKA TEPEE RESORT
<p>RESPONSE:</p> <p>Commenter’s opinion. NPS can legitimately use snowmobiles for administrative purposes such as search and rescue, law enforcement, emergency actions, and science and resource support. This is in accordance with law, policy, regulation and executive order. We fail to see how this is unethical given the legitimate, non-recreational needs for which these provisions were made. However, as described in the existing decision, routine administrative use and employee travel will increasingly be accommodated using snowcoaches.</p>
<p>COMMENT:</p> <p>NPS must place a higher priority on Sylvan Pass so that it reopens in a timely manner following storms. NPS must spread the use over all of the park instead of just the west, south, and Old Faithful regions.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>

LETTER 106. RANDY ROBERSON, YELLOWSTONE VACATIONS
<p>COMMENT:</p> <p>The public’s acceptance of alternatives 1, 1A, and 3 will be negative due to economic impacts. In addition, people want to see the park individually without a guide. Guided trips also make “gate hopping” impossible.</p>
<p>RESPONSE:</p> <p>A review of public comment indicates that the majority, by a wide margin, is in favor of alternative 1a – the existing decision. The primary reason is so that park resources, including the opportunity to appreciate a more natural winter experience, may be protected. If the alternative to having no snowmobile access is to have access with a guide, perhaps the current snowmobile visitorship would be accepting. Guides offer positive experiences, especially for novice snowmobile operators or first-time visitors. There is no reason programs cannot be worked out for entering one gate and leaving another, or overnighting at different gates.</p>
<p>COMMENT:</p> <p>Capping below 900 snowmobiles per day without dependable snowcoach technology is in effect capping historical visitation numbers. Until new snowcoach technology, like the “Red Bus” becomes available, private enterprise will not invest in snowcoaches.</p>
<p>RESPONSE:</p> <p>The current situation is that resources and values in the parks are impaired. The existing decision is based on this finding. The use to be allowed must be consistent with park resources and values. The direct implication of this is that changes must be made. New technology does not eliminate impairment or adverse impacts by itself. This is a finding made in the current decision, since new technology <u>was</u> considered in the FEIS. Therefore, changes in the amount or type of use must be made. Capping below 900 represents a necessary change. However, it can be demonstrated for both alternative 2 and 3 that the interim caps would still allow more total annual use in the parks than has been experienced to date, on the average.</p>

LETTER 106. RANDY ROBERSON, YELLOWSTONE VACATIONS**COMMENT:**

What data are the economic impact estimates based on? An adaptive management plan must be crafted to protect historical visitation levels. I recommend a 3-5 year transition period while applying an adaptive management plan.

RESPONSE:

The data and methods for economic impact analysis are fully disclosed and explained in the FEIS and the DSEIS. Adaptive management, by definition, is crafted to adjust management for the protection of park resources and values – not to protect any particular level of use that the business community may desire. As an interim and initial measure, NPS intends to maintain the historic level of visitation regardless of the alternative that may be selected out of the SEIS. Adaptive management may lower or raise visitation or may adjust the numbers of snowcoaches and snowmobiles to be allowed. As expressed in response to an earlier comment, the emphasis will be to replace snowmobile use with snowcoaches over time, as they would be a less impactful form of access, and snowcoaches themselves will be improved. Adaptive management under any alternative could result in temporary or permanent closures, seasonal restrictions, area closures, or other measures that appear to be necessary based on resource monitoring.

LETTER 107. CLYDE SEELY, WEST YELLOWSTONE MT**COMMENT:**

I was extremely disappointed that no mention of the development of the “new concept” snowcoach was included in the DSEIS.

RESPONSE:

Additional details concerning development of the “new concept” snowcoach are presented in Chapter III.

LETTER 108. WEST, SOUTH AND EAST GATE OPERATORS
<p>COMMENT:</p> <p>Letter is from: Seeley, Carsley, Loomis, Roberson, Gatheridge, Holstein, Walker, Coe Concerns that the Bombardier snowcoaches and retrofitter snowcoaches they operate are not mechanically capable of, nor enticing enough to the public, to satisfy the total needs of winter transportation in Yellowstone of the magnitude envisioned in the November, 2000, ROD. There are no studies that show the public in general will continue to come to see Yellowstone if the only mode of transportation is the snowcoach.</p>
<p>RESPONSE:</p> <p>NPS acknowledges the concern, but believes that there is a larger market of those who may appreciate a different form of access to the park. At the same time, snowmobilers will not stop coming to West Yellowstone and will continue to enjoy opportunities outside the park. Snowmobiling in the park was not an overnight development; it evolved over time. A concerted effort at marketing a new winter experience in the park, on top of all the publicity this effort has generated, could materially shorten the transition.</p>
<p>COMMENT:</p> <p>We agree with the necessity of a “new concept” snowcoach. It must be mechanically proven and practical as a means of winter transportation capable of carrying large numbers of visitors. The development and purchase costs of such snowcoaches appear well beyond the financial means of any existing operators. They must be funded by the government.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>The FSEIS must state the intent of the NPS to provide such vehicles and that a reduction in snowmobiles must be offset by increased snowcoach availability and acceptance. NPS must also explain that this cannot happen with the existing fleet of hybrids and older model machines in current use.</p>
<p>RESPONSE:</p> <p>The SEIS is intended to disclose the degree to which new <u>snowmobile</u> technology can mitigate the impacts of snowmobiles presently in use. That is the function of looking at different snowmobiling alternatives. The FSEIS is not a referendum on snowcoaches. NPS intent regarding the snowcoach alternative is fully spelled out in the existing decision/ROD. It will be the purpose of a new decision to address NPS intent based on analysis from the SEIS.</p>
<p>COMMENT:</p> <p>Snowcoach viability must be based on the following: “new concept” snowcoaches must be proven workable and produced in sufficient quantities; construct maintenance and garage facilities; finance a marketing effort; provide sufficient time to make the transition from snowmobile to snowcoach.</p>
<p>RESPONSE:</p> <p>See previous responses.</p>

LETTER 108. WEST, SOUTH AND EAST GATE OPERATORS

COMMENT:

NPS must state unequivocally that it does not intend to cut historical winter visitation levels. New snowcoach technology, new 4-stroke snowmobiles, and continuing the pilot program will decrease the environmental concerns and allow historical visitation levels; if NPS will not commit to maintain historical visitation levels, we will interpret such action as a public acknowledgement that NPS intends to reduce winter visitation to Yellowstone and surrounding communities.

RESPONSE:

NPS has stated that it is its intent to maintain historical visitation levels. In fact, NPS believes that visitation to West Yellowstone ("heads in beds" - the basis for many of the economic impact assertions) could increase with a snowcoach only alternative. This would be the product of a new winter visitor experience in the parks, attracting a whole new user to West Yellowstone, and the continuance of quality snowmobiling on other lands outside the park. Further, all visitation and use scenarios in both the FEIS and the SEIS are clearly based (as stated in the assumptions) on annual historical visitation, replicating average daily use. This includes the existing decision. NPS will clearly state this intention in the alternative descriptions. However, statements about visitation and how it may change in the future, based on adaptive management implementation or on carrying capacity analysis (as the case may be), will remain.

COMMENT:

Snowcoach only is not viable because of safety and distances between destinations (east gate operator).

RESPONSE:

See letter from Pahaska Tepee, which in one or more comments argues for providing snowcoach access to the East Entrance. It is inconsistent, or at the least confusing, that the commenter would argue for the measure and say it is not viable at the same time.

LETTER 109. WEST YELLOWSTONE RENTAL OPERATORS

COMMENT:

This letter is signed by representatives from Three Bear Lodge, Yellowstone Arctic/Yamaha, Travelers Snowmobile Rentals, Old Faithful Snowmobile Rentals, Back Country Rentals, Alpine West, High Mark Snowmobile Rentals, Two Top Snowmobile Rentals, Yellowstone Adventures, Yellowstone Vacations, Yellowstone Rentals and Sports, ABC Rentals, Hi Country Snowmobile Rentals, and West Gate Station. With the proposed cap of 330 snowmobiles per day proposed by Alternative 3, snowmobilers would decrease by 34,260 people, at the rate of \$255 per person, translating to a loss of \$8.7 million in revenue to West Yellowstone.

RESPONSE:

This calculation is suspect. The average daily snowmobile visitation at the West Entrance is about 555. A reduction of 225 visitors per day over 90 days access into the park would be just over 20,000. We cannot speak to the \$255 per person per day value, but point out that the Sylvester study cited elsewhere assumes a value of \$225 per day for non-residents who rent snowmobiles. For comparison, the State of Wyoming reports expenditures at \$180 per day for outfitter clients, about \$100 per day for unguided non-residents, and \$68 for unguided residents. Finally, there is no accounting for replacement use, or for continued snowmobiler visitation on adjacent national forest lands. Alternative 3 provides for sufficient snowcoach seats to replace the lost snowmobiles – for no change in visitation at West Yellowstone. Also, if each of the 330 snowmobiles were occupied by 2 people instead of 1, park visitation by snowmobile would be 660 people instead of 555.

COMMENT:

As for guided only, it is difficult to hire personnel for a short season, exclusive and qualified training requirements would stretch the employment capabilities, and peaks and valleys of volume would require lay offs during down time.

RESPONSE:

On the one hand there appears to be a great concern about lost jobs and income for snowmobile-related business, and even about lost business growth potential. On the other hand it appears that businesses cannot afford to hire guides. These two stances appear to be inconsistent.

COMMENT:

The snowcoach-only alternative would deny photographers the ability to stay in on place for hours. A great number of snowmobile patrons enter one gate and exit another. Therefore, they wouldn't come if they were required to have a guide. Increased grooming effort can allow much more than 300 snowmobiles on normal days. We would like to see the letter of November 8, 2001, which was referenced. We believe that double grooming at night and daytime would support 900 visitors per day.

LETTER 109. WEST YELLOWSTONE RENTAL OPERATORS

RESPONSE:

Scheduling mass transit to meet visitor needs such as those described seems to be within the realm of possibility. At present, arrangements can be made or regular routes are run to drop off skiers and snowshoers. Shuttle services can be designed. Regarding double grooming: parks do not have sufficient base funds to support the current winter program. In order to implement either alternative 2 or 3, additional funds are needed in quantity just to implement adaptive management and other monitoring.

COMMENT:

The FSEIS should describe the “new concept” snowcoach. Despite increased advertising, snowcoach volume dropped last year. Numbers of snowmobiles should only be decreased when it does not decrease the historical visitation levels. The FSEIS should refer to “booked” seats rather than “available” seats.

RESPONSE:

Snowcoach use into the park is not as attractive as it might be because nonmotorized user clientele are generally deterred by the presence of snowmobiles. Numbers of snowmobiles need to be decreased as an attempt to eliminate impairment and adverse impacts on park resources, including the experiences of other users. The FSEIS will provide discussion of a new snowcoach.

COMMENT:

We do not believe that 50% of snowmobile visitors would reschedule their visits for non-peak use periods. We have tried price incentives to move visitors to our slower periods without success. What data supports the claim that the average visitor to West Yellowstone spends only one day of a multi-day trip in YNP?

RESPONSE:

Apparently there is little present incentive, despite price breaks, not to come at peak times. No controls have been applied. If there is a limit, consumer practices are more likely to change. The source for this claim is a study cited in the FEIS: Freimund, W. et al. 1997 entitled *Motorized winter use distribution and preliminary experience quality indicators in Yellowstone National Park*.

COMMENT:

For Alternative 2, mitigation should be used before carrying capacities are implemented. No reduction of snowmobiles should occur until the “new concept” snowcoaches are produced, tried, proven, and successfully marketed. The park should be required to sell only bio-based fuels in the park.

RESPONSE:

Snowmobiles have been found to impair park resources and values. NPS is required to act immediately to eliminate the source of impairment. Further, even if there is no finding of impairment, adverse impacts on park resources and values – and visitor experiences – require management changes. NPS cannot arbitrarily ignore adverse impacts because of perceived commercial needs. Even if there is a means for NPS to ensure their use in the parks, cleaner and quieter snowmobiles and bio-based fuels do not address all impacts by themselves in a way that reduces the overall level of impact on air quality, the natural soundscape, wildlife, and other visitors.

LETTER 109. WEST YELLOWSTONE RENTAL OPERATORS
<p>COMMENT:</p> <p>We question the economic impact estimates. We call your attention to the study commissioned by the Montana Bureau of Business and Economic Research at the University of Montana., which shows that if there is a ban on snowmobiles, there would be \$10-15 million loss to West Yellowstone and 150 FTEs.</p>
<p>RESPONSE:</p> <p>This study will be considered. A more detailed discussion of impacts on West Yellowstone is provided in the FSEIS.</p>
<p>COMMENT:</p> <p>Snowcoaches have greater wildlife impacts than snowmobiles because they are larger. The snowcoach has a hard time passing bison without making them run.</p>
<p>RESPONSE:</p> <p>No response necessary. Commenter's opinion.</p>
<p>COMMENT:</p> <p>Explore incentives for double riding snowmobiles and for snowcoach usage. Continue the pilot program in all areas. Effort should be made to de-emphasize punitive enforcement and encourage assistance perceptions. Implement immediately, early and late rubber tracked coach access into the parks. Establish an advisory council with park management and gateway community business leaders.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>What science justifies that the CDST will support only 150 snowmobiles? An adaptive management plan should be implemented.</p>
<p>RESPONSE:</p> <p>Average daily use on the CDST through Grand Teton and the Parkway is 25. NPS has not been presented with any science that justifies more than a six-fold increase in current use, when the intent parkwide is to limit use at near-historic levels. It appears that sufficient allowance is being made for use on this route, pending adaptive management determinations. Adaptive management IS to be implemented under all alternatives. Adaptive management can result in LOWER use, so it may make sense to start lower. And, travel on the CDST is of concern from the safety standpoint. It is narrow, being carved out of the road shoulder and sometimes even encroaching on the road surface. It is difficult to keep groomed, and it is an uncomfortable ride at most times.</p>
<p>COMMENT:</p> <p>We request that a motorized-free zone be established between Old Faithful Snow Lodge and the Old Faithful Visitor Center, which would reduce sight and soundscape concerns for those who wish a pristine noise free experience while at the visitor center, geyser, and the Snow Lodge. In addition, there should be more cross-country ski trails away from roadways. Establish a pre-screening station on peak days at or near the entrance sign where air is not trapped. Rangers could check passes at this station, turn around machines that are too loud, etc.</p>

LETTER 109. WEST YELLOWSTONE RENTAL OPERATORS

RESPONSE:

Most of these measures could be implemented, with rationale, under any winter use plan. There are limitations on providing groomed nonmotorized trails away from roadways, but it is possible to implement such measures through further site-specific environmental analysis.

COMMENT:

There are several attachments including charts depicting West Gate visitation and the effect of a 330 daily limit, the economic effects of the 330 limit, information related to a petition entitled, "A call for a healthy economy and a healthy park," information comparing the emissions of snowcoaches vs. 4-stroke snowmobiles, and several other miscellaneous letters.

RESPONSE:

Materials have been reviewed. No response.

LETTER 110. YELLOWSTONE ARCTIC ♦ YAMAHA

COMMENT:

I do not support any decision that would ban snowmobiles and restrict winter access to a snowcoach only mass transit system (eliminating alternatives 1a and 1b). The park must be protected and the new 4-stroke technology and bio-based fuels do this. Increased ranger presence will address animal issues. Public access must be protected and snowcoaches cannot do that. The economies of the gateway communities must be protected. Alternative 1a would eliminate snowmobile use for 37,000 people who visit West Yellowstone and the current snowcoaches cannot serve this interest. More time is needed for the transition. Similar concerns exist with alternative 2 as presented in the draft SEIS. Mitigation must occur to alleviate problems before adaptive management is used.

RESPONSE:

See following responses.

COMMENT:

Alternative 3: This alternative would cause a loss of \$8,755,425 in revenue to West Yellowstone. While guided only is meant to curb wildlife problems, it severely limits the number of people that would come to the park. Some would not come because of the loss of individual freedom; others because of the limitation on the numbers through the West Entrance. Employing that many qualified guides would be a problem, as would finding a sufficient number of snowcoach drivers. The early closing date would make it difficult to hire employees for such a short season. Tying the number of snowmobiles allowed to enter at the West Entrance in 2003-04 to the number of snowcoach seats available throughout the park does not make sense.

RESPONSE:

The impacts on West Yellowstone are discussed in greater detail in the FSEIS. Management changes must be made or NPS is not in compliance with its fundamental mandate.

LETTER 110. YELLOWSTONE ARCTIC ♦ YAMAHA
<p>COMMENT:</p> <p><u>Alternative 2:</u> This is the most acceptable alternative, but needs modifications to reduce the economic impacts to West Yellowstone. Changes include: Historic visitation numbers at the west gate (approximately 60,000) must be protected and guaranteed in order to protect the economic viability of the community and the businesses in town. The goal of maintaining the current level of recreational visitation in parks, although modes of access differ must be paramount in the final decision. A longer phase-in is needed. All rental operators must use clean, quiet 4-stroke machines by the winter of 2003-04. The public should have 2 to 5 years to meet this requirement. Interim use limits should be: 2003-04 – unlimited machines (status quo); 2003-04 – West Entrance cap at 900/day; 2004-05 – West Entrance cap at 700/day if the “new concept” snowcoach is in operation and accepted by the public. Need a reservation system for peak visitation times. The park should open before 7 a.m. to allow photographers to have early morning access. The speed limit of 35 mph should only be between West Yellowstone and Old Faithful. Develop incentives for double riding on snowmobiles. Develop incentives to increase snowcoach use. Encourage, but do not require, guide use. Keep and expand the pilot program of the winter 2001-02 (increase ranger presence, increase grooming, all West Entrance passes should be pre-purchased, color code passes, expand interpretive programs, provide expanded literature for general public education). Increased grooming with new equipment and new techniques. Expand the increased grooming to other parts of Yellowstone. Adaptive management must consider true scientific research. Before research, there should be a serious attempt to mitigate all concerns or problems. Changes resulting from adaptive management should be phased in over 1 to 2 years.</p>
<p>RESPONSE:</p> <p>No changes are to be made in alternative 2, except as requested by the State of Wyoming. Regarding many requested changes, see previous responses.</p>
<p>COMMENT:</p> <p>NPS must commit to spend a couple of hundred thousand dollars annually for at least 5 years to reach the new clientele to fill the “new concept” snowcoaches. If the “new concept” snowcoach does not become a reality, the cap of 900 clean, quiet machines per day would remain as a limit unless the visitor capacity study shows the number can increase.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>
<p>COMMENT:</p> <p>Establish a Yellowstone Recreation Advisory Council to assist with program management. Community and business members should be included on this council.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>

LETTER 110. YELLOWSTONE ARCTIC ♦ YAMAHA

COMMENT:

Tell the Truth about the All Snowcoach Plan: The plan would need 184 coaches to carry the historic level of 60,000 people into the park. This would cause congestion and animal harassment. It would take 12.5 hours to stage all of the snowcoaches into the park. 45 snowcoaches would leave after dark. The FSEIS should discuss implementation issues with the “new concept” snowcoach. The all snowcoach plan would leave much of the park inaccessible to winter visitors due to great distances between points. It would eliminate crossover traffic from gate to gate. The existing snowcoaches emit more pollution than the Arctic Cat 4-stroke snowmobile.

RESPONSE:

All of the assumptions about a snowcoach-only plan were revealed in the DEIS, the FEIS, and the DSEIS. Snowcoach access has worked for years, it works now, and it can work in the future in an expanded program. Implementation details can be worked out during implementation through an adaptive management approach. It will require effective partnerships and a willingness to participate. Much interest was evident after the decision was made in 2000. Much interest still remains for production of a new generation snowcoach.

COMMENT:

Emissions and Air Quality: The Arctic Cat 4-stroke snowmobile has been proven to be very clean, fuel efficient, and quiet. There have never been any violation of ambient air quality standards in Yellowstone National Park related to snowmobiles.

RESPONSE:

Improvement in snowmobiles is encouraging. However, the amount of use to be allowed is a critical point. Any reduction in total emissions is offset by allowing greater numbers. The necessity is to reduce total emissions in the national park. Many earlier responses address this issue of NAAQS standards. Even though standards may not be exceeded, air quality can be very poor relative to the protection mandate in national parks. NPS has an affirmative responsibility under the Clean Air Act to maintain air quality at the best level it can be. It also has a fundamental mandate to protect and conserve air quality as a park resource.

COMMENT:

Sound: As shown by a recent study (cited), the sound level of the Arctic Cat 4-stroke is less than one-half of the snowcoaches running in the park.

RESPONSE:

The snowcoach-only alternatives affect far less of the natural soundscape, in terms of acres where vehicle noise is audible, than in either of the snowmobile alternatives.

COMMENT:

Wildlife: There is no more conflict between wildlife and snowmobiles than between wildlife and automobiles. Rangers should assist winter visitors in working their way through the animal concentrations. The populations of wildlife in the park are above carrying capacity. Wheeled vehicles cause more stress to the animals.

RESPONSE:

These are unsupported statements. The DEIS, FEIS, and DSEIS illustrate the adverse impacts of oversnow motorized vehicles on wildlife.

LETTER 110. YELLOWSTONE ARCTIC ♦ YAMAHA
<p>COMMENT:</p> <p>Economics: Alternative 1a will be financially catastrophic to the gateway communities. The results of a cap of 330 snowmobiles per day will cause \$8,744,425 in revenue loss to West Yellowstone alone. Businesses in West Yellowstone are financed in reliance on a good year-round economy. All of the gateway communities would lose revenue from business generated from the crossover, gate to gate traffic. The future loss of revenue would translate into the loss of 150 full time jobs in West Yellowstone (citing a study).</p>
<p>RESPONSE:</p> <p>The impacts on West Yellowstone are discussed in greater detail in the FSEIS.</p>
<p>COMMENT:</p> <p>Attachments include Charts of 2001-02 West Gate Snowmobile Entries; emissions comparisons of 4-stroke snowmobiles and snowcoaches; gasoline costs/customer – snowcoaches and snowmobile comparison; copy of May 7, 2002, comment letter to NPS from Dr. Gary A. Bishop; copy of October 9, 2001, letter from attorneys for the International Snowmobiles Manufacturers Association to Iobst (NPS); copy of March 15, 2002, letter from Montana DEQ to Howell; Supplemental vehicle sound measurement; economic report by James T. Sylvester, dated May, 2002. Updated on May 29, 2002, with report from Sean Blacklocke.</p>
<p>RESPONSE:</p> <p>No response necessary.</p>

LETTER 111. YELLOWSTONE ALPEN GUIDES - SCOTT CARSLY
<p>COMMENT:</p> <p>The best possible technology snowmobiles should be allowed into Yellowstone in limited numbers with a combination of guided and unguided trips.</p>
<p>RESPONSE:</p> <p>Alternative features such as these are being evaluated in the SEIS.</p>
<p>COMMENT:</p> <p>Snowmobiles entering Yellowstone should be as clean and quiet as possible. NPS should increase those standards through time to ensure that the snowmobiles entering Yellowstone are absolutely as clean and quiet as possible. Advance technology snowmobiles should be labeled as meeting Yellowstone/Teton emission standards so NPS personnel can easily identify them.</p>
<p>RESPONSE:</p> <p>Use of best available technology (BAT), and encouraging continued improvement over time, is an underpinning of alternative 3. It is NPS' determination that the only way to ensure the use of BAT machines in the parks is by implementing a guided-tour only requirement for recreational snowmobile use. It does not appear that a labeling requirement will be part of the EPA rule, or that there will be any assurance in implementing the rule that machines entering the park will be the cleanest available machines. Due to fleet averaging and lack of a suitable labeling requirement, NPS will have no means of identifying the cleanest and quietest machines.</p>

LETTER 111. YELLOWSTONE ALPEN GUIDES - SCOTT CARSLY**COMMENT:**

Over-snow conditions in Yellowstone absolute have the greatest impact of all snowmobile variables being considered on both my business (snowcoach operator) and the winter visitor experience. As road conditions deteriorate, so does the snowcoach experience. Travel becomes slow, uncomfortable, and dangerous. The tour is affected because travel is slower and, thus, fewer stops are possible. We are unable to provide the tour we are accustomed to during good road conditions. Rough road conditions exclude many visitors who have health ailments such as bad backs, necks, or internal problems.

The cost of repairs to snowcoaches skyrockets during rough road conditions.

Keeping all other variables constant, the visitor experience deteriorates as the road conditions deteriorate, which is directly related to the number of snowmobiles that have passed over the road.

RESPONSE:

This information is a relevant to visitor experience and is referred to in the FSEIS.

COMMENT:

Overall snowmobile numbers must be severely limited to ensure road conditions remain acceptable for all visitors. It has been proven and is obvious that snowmobile trails become rougher and rougher as more and more snowmobiles travel over them.

Road conditions begin to significantly deteriorate in warm conditions after approximately 300 snowmobiles travel over them. In cold conditions, many more snowmobiles can travel the roads without the road surface destruction. Unless you use a sliding scale that allows more snowmobiles into the park during colder conditions, you must limit the snowmobile numbers based on the worst-case scenario of the warm conditions.

RESPONSE:

This is in part the basis for reducing numbers through the West Entrance in alternative 3.

COMMENT:

The road conditions during the winter of 2001-02 were the best I have experienced. They were a combination of great weather, cold with new snow at key times, and increased grooming under the pilot program. The increased grooming and possibly different grooming techniques must be continued and examined in winters of lower snowpack and warmer conditions.

RESPONSE:

No response necessary.

COMMENT:

Many snowmobile users enjoy traveling at their own pace. Many do not reach one of Yellowstone's icon destinations, rather they spend the time watching or photographing wildlife. There should be guided and unguided snowmobiling allowed in Yellowstone to accommodate these visitors. Reducing snowmobile numbers and allowing a mix of guided and unguided trips will necessitate a permit/reservation system much as the NPS and Forest Service use on rivers now.

RESPONSE:

No response necessary.

LETTER 111. YELLOWSTONE ALPEN GUIDES - SCOTT CARSLY
<p>COMMENT:</p> <p>New snowcoach technology is imperative to the success of this plan. Existing designs are not adequate for transporting the increased snowcoach visitors projected in the plan. I am concerned about the effectiveness as an oversnow vehicle of the new concept bus/snowcoach. I suspect the bus will fit the parks needs for a wheeled vehicle, but will be inadequate as an oversnow vehicle. It is important that the momentum to develop a successful new snowcoach continues. Also, the purchase price of these vehicles will be beyond the private operator. A user lease program, possibly similar to the transportation agreement now with Xanterra, must be available to the smaller private businesses and should be included in the final plan.</p>
<p>RESPONSE:</p> <p>NPS is aware of the need to develop a functional and efficient new generation snowcoach, and of the need to help make that technology affordable for operators. This should be addressed in the decision to be made.</p>
<p>COMMENT:</p> <p>Visitors love the experience of visiting Yellowstone in the historic Bombardier snowcoach. This “step into the past” should be preserved. These older vehicles can be brought to acceptable emission standards at a cost of about \$10,000 per vehicle. Government financial assistance should be available to operators wishing to maintain this historic mode of travel.</p>
<p>RESPONSE:</p> <p>Historic flavor is one of the design criteria for a new generation machine. NPS agrees that if current machines are serviceable and can be retrofitted to standards for emissions and sound (which should be a function of the decision to be made), they should be retained for this reason.</p>
<p>COMMENT:</p> <p>Negative economic impacts to the local communities of transferring use from snowmobiles to snowcoaches should be minimized through maintaining historic winter visitation levels. To ensure success of the new winter program, a governmental promotional campaign should be designated in the final SEIS.</p>
<p>RESPONSE:</p> <p>NPS’ intent in the existing decision and all alternatives analyzed directly infer that visitation is to remain the same, though modes of access would change. Similarly, in the existing decision, measures are spelled out in regard to NPS intent to assist in marketing and develop such efforts in partnership with communities and others.</p>
<p>COMMENT:</p> <p>A simple adaptive management technique to maintain historic use levels would reduce snowmobile use as snowcoach use increases.</p>
<p>RESPONSE:</p> <p>See response to previous comment. The continuing emphasis over time will be to improve oversnow machine technology and to encourage visitation by snowcoach versus snowmobile. The net effect would be to continually reduce impacts on the park and other visitors.</p>

LETTER 111. YELLOWSTONE ALPEN GUIDES - SCOTT CARSLY**COMMENT:**

Local economic concerns should be considered but should not dictate NPS policy. Preserving and protecting the Yellowstone resource should be first and foremost in any decisions made regarding appropriate Yellowstone visitation.

RESPONSE:

No response necessary.

LETTER 112. YELLOWSTONE SAFARI COMPANY**COMMENT:**

Consider revisiting some options in the DEIS, including the option of plowing the road from West Yellowstone to Old Faithful. It would provide the greatest visitor safety and the greatest options for people of all economic classes to visit in a clean and quiet manner. It would allow the greatest number of visitors, at the least expense, to visit the thermal areas. It also would allow commercial interest to provide services and allow for future business expansion.

RESPONSE:

This was the DEIS preferred alternative, and a number of positive features are associated with it. The decision maker does have this option to consider in a new decision, along with a number of features through the entire range of actions considered in the FEIS.

COMMENT:

The general public will respond favorably to an elimination of snowmobiling or any form of winter transport to the geyser basins. My one busy winter month follows the closing of Yellowstone to snowmobiles (after mid-March).

RESPONSE:

No response necessary.

COMMENT:

The current system is neither sustainable nor beneficial to all users. I stopped using the Old Faithful area in the winter of 1991. The noise and air pollution simply precluded a nature-based experience. Our business opportunity was eliminated.

RESPONSE:

NPS holds that nonmotorized uses have been displaced from the park. Yours is a good example of this contention.

COMMENT:

Regarding restrictions of nonmotorized use on the Northern Range: we avoid trails because skiing does not jibe with snowshoeing. We disturb less wildlife than the average visitor, neither commercial nor noncommercial. Closing the off-trail use on the Northern Range will eliminate our product and service.

LETTER 112. YELLOWSTONE SAFARI COMPANY
<p>RESPONSE:</p> <p>This is beyond the scope of the SEIS, whose purpose was to evaluate new snowmobile technology.</p>
<p>COMMENT:</p> <p>You should consider zoning use, identifying regions and the types of appropriate use in those areas.</p>
<p>RESPONSE:</p> <p>Zoning is a fundamental part of this plan. Zone types are defined (as you suggest) in the FEIS and they are part of each alternative description. Zone definitions and the identification of objectives provided therein represent the basis for adaptive management standards as well. These standards are shown for management zones 2 through 8, by alternative, in DSEIS table 11. Definitions, objectives and standards for other zones are in both the earlier FEIS and the record of decision.</p>